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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-cr-00142-CDS-DJA

Plaintiff

V.

MEELAD DEZFOOLI,

**Order Granting United States of America's Motion for an Interlocutory Order Sale of 176 Glen Falls Avenue, Henderson, Nevada 89002**

## Defendant

The United States moves this Court to issue an order for an Interlocutory Sale of real property held in the name of Sanam Limited, located at 176 Glen Falls Avenue, Henderson, Nevada 89002 (176 Glen Falls),<sup>1</sup> which is subject to criminal forfeiture<sup>2</sup> and forfeited in the Preliminary Order of Forfeiture,<sup>3</sup> and to authorize Doug Sawyer as the

<sup>1</sup> 176 Glen Falls Avenue, Henderson, Nevada 89002 (176 Glen Falls)<sup>1</sup>, more particularly described as:

LOT 17 IN BLOCK "C" OF PARADISE HILLS NO. 16, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 97 OF PLATS, PAGE 8, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA. EXCEPTING THEREFROM ALL MINERALS, OIL, GAS PETROLEUM, OTHER HYDROCARBON SUBSTANCES AND ALL GEOTHERMAL ENERGY SOURCES IN OR UNDER OR WHICH MAY BE PRODUCED FROM THE WITHIN-DESCRIBED LAND WHICH LIE BELOW A PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF THE WITHIN-DESCRIBED LAND, FOR THE PURPOSE OF PROSPECTING, EXPLORATION, DEVELOPMENT, PRODUCTION, OR EXTRACTION OF SAID SUBSTANCES BY MEANS OF MINES, WELLS, DERRICKS, AND/OR OTHER EQUIPMENT; PROVIDED, HOWEVER, THAT THE OWNER OF SAID SUBSTANCES SHALL HAVE NO RIGHT TO ENTER THE SURFACE OF THE WITHIN-DESCRIBED LAND NOR TO USE SAID LAND ABOVE SAID PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF SUCH LAND; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 179-31-212-022.

<sup>2</sup> Superseding Criminal Indictment (SCI), ECF No. 97.

<sup>3</sup> Preliminary Order of Forfeiture (POOF), ECF No. 251.

1 designated real estate agent to sell 176 Glen Falls. Meelad Dezfooli identified himself as the  
 2 sole owner of Sanam Limited.<sup>4</sup>

3 The grounds for granting the Order for an Interlocutory Sale of 176 Glen Falls are as  
 4 follows. First, 176 Glenn Falls is subject to taxes, its fees, HOA fees, and liens, and the  
 5 granting of an interlocutory sale will stop the accruing of taxes, its fees, HOA fees, and liens  
 6 against its value. Second, granting an interlocutory sale will avoid accidents and liability  
 7 accruing against 176 Glen Falls. Third, this Court is authorized to approve interlocutory  
 8 sales.

9 This Motion is made and is based on the following Memorandum of Points and  
 10 Authorities, the pleadings and papers on file herein, and the attached Exhibits.<sup>5</sup>

## 11 **MEMORANDUM OF POINTS AND AUTHORITIES**

### 12 **I. STATEMENT OF FACTS**

13 The United States adopts and incorporates the facts stated in the Superseding  
 14 Criminal Indictment;<sup>6</sup> Motion to Prevent HOA Eldorado Third Community Association's  
 15 Default Foreclosure Sale of 1829 La Calera Avenue, North Las Vegas, NV 89084 (La  
 16 Calera Prevent Sale Motion);<sup>7</sup> Motion to Prevent Pearl Creek HOA Default Foreclosure  
 17 Sale of 890 Harbor Avenue, Henderson, NV 89002 (Harbor Ave. Prevent Sale Motion);<sup>8</sup>  
 18 Motion to Prevent Foreclosure Sale of 6033 Watermelon Street, North Las Vegas, NV  
 19 89081 (Watermelon Prevent Sale Motion);<sup>9</sup> Motion for an Interlocutory Order of Sale of  
 20 6116 Chinook Way, Las Vegas, NV 89108 (Chinook Interlocutory Sale Motion), and

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 22  
 23  
 24 <sup>4</sup> SCI, ECF No. 97, p. 2.

25 All Exhibits are attached hereto and incorporated herein by reference as if fully set forth  
 herein.

26 <sup>6</sup> SCI, ECF No. 97.

27 <sup>7</sup> Government's Motion to Prevent HOA Eldorado Third Community Association's Default  
 Foreclosure Sale of 1829 La Calera Avenue, North Las Vegas, NV 89084, ECF No. 60.

28 <sup>8</sup> Government's Motion to Prevent Pearl Creek HOA's Default Foreclosure Sale of 890  
 Harbor Avenue, Henderson, NV 89002, ECF No. 93.

<sup>9</sup> Government's Motion to Prevent Foreclosure Sale of 6033 Watermelon Street, North Las  
 Vegas, NV 89081, ECF No. 95.

1 Motion to Prevent the Sales of 176 Glen Falls Avenue, Henderson, Nevada 89002 (Glen  
 2 Falls Prevent Sale Motion).<sup>10</sup>

3 Beginning on or around April 2020 and continuing until at least on or around March  
 4 2021, Meelad Dezfooli knowingly executed, and attempted to execute, a scheme to defraud  
 5 and artifice to obtain money and property owned by, and under the custody and control of,  
 6 financial institutions by means of materially false and fraudulent pretenses, representations,  
 7 and promises. Dezfooli submitted fraudulent PPP loan applications and obtained  
 8 approximately \$11.2 million to unjustly enrich himself and others.<sup>11</sup>

9 On or about April 8, 2020, Dezfooli completed and signed the PPP Borrower  
 10 Application Form in support of a \$1,093,606.52 loan for Best Floors through Financial  
 11 Institution A.<sup>12</sup> Dezfooli caused Financial Institution A to disburse the proceeds of the  
 12 fraudulently obtained PPP loan, \$1,093,606.52, to First Savings Bank account ending in  
 13 4648 (FSB x4648) held in the name of Best Floors (dba Best Buy Flooring). Dezfooli had  
 14 sole signatory authority over FSB x4648.<sup>13</sup>

15 After receiving the PPP loan proceeds from Financial Institution A, Dezfooli wrote a  
 16 check to “cash” for \$225,000 that was drawn on FSB x4648, containing the fraudulently  
 17 obtained proceeds, and deposited it into an account at US Bank account ending in 4334  
 18 (USB x4334), held in the name of A-Series.<sup>14</sup>

19 As further part of the scheme to defraud, on or about April 12, 2020, Dezfooli  
 20 completed and submitted another PPP loan application through Financial Institution B’s  
 21 online lending portal in support of a \$1,464,780 loan for A-Series. Dezfooli identified  
 22 himself as the CEO and 100% owner of A-Series and had sole signatory authority over USB  
 23

24 <sup>10</sup> Government’s Motion to Prevent the Sale of 176 Glen Falls Avenue, Henderson, NV  
 25 89002, ECF No. 231.

26 <sup>11</sup> SCI, ECF No. 97.

27 <sup>12</sup> SCI, ECF No. 97 p. 5-7; Harbor Ave. Prevent Sale Motion ECF No. 93-1, Exhibit (Ex.)  
 28 1-1 excerpt, PPP Loan Application, p. 3-37.

<sup>13</sup> SCI, ECF No. 97, p. 6; Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book 7  
 excerpt, line 8; Ex. 1-2 excerpt, FSB signature cards, p. 38-51.

<sup>14</sup> SCI, ECF No. 97, p. 7; Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book 7  
 excerpt, p. 123, line 22; deposit - book 6, p. 121, line 9.

1 x4334.<sup>15</sup> Dezfooli caused Financial Institution B to disburse the proceeds of the fraudulently  
 2 obtained PPP loan, \$1,464,780, into USB x4334.<sup>16</sup>

3 On May 16, 2020, Dezfooli purchased three cashier's checks – check nos. x6727,  
 4 x6728, x6729 – in the amount of \$100,000 each from the illegal proceeds in USB x4334.  
 5 Check nos. x6728, x6729 were used as partial payments for the purchase of 890 Harbor  
 6 Avenue, Henderson, Nevada.<sup>17</sup>

7 On May 21, 2020, Dezfooli used the third check, check no. x6727 for \$100,000, from  
 8 USB x4334 to purchase 6033 Watermelon Street, North Las Vegas, Nevada, 89081<sup>18</sup> for  
 9 \$40,000 at a Trustee's Sale to be vested under the name of Sanam Limited, another entity  
 10 formed by Dezfooli to further his scheme of PPP loan applications.<sup>19</sup> Dezfooli received a  
 11 \$60,000 refund from this transaction that was deposited into a Wells Fargo account ending  
 12 in 4756 (WF x4756) held in the name of Sanam Limited.<sup>20</sup>

13 As further part of the scheme to defraud, Dezfooli completed and signed a third  
 14 PPP loan application around April 27, 2020, for a \$8,672,800 loan through Financial  
 15 Institution C on behalf of Nevada Sales, dba Nevada Design. Dezfooli identified himself as  
 16 the manager and 100% owner of Nevada Sales.<sup>21</sup>

17 Dezfooli caused \$8,672,800 of the fraudulently obtained PPP loan to be disbursed  
 18 by Financial Institution C into a Wells Fargo account ending in 3281 (WF x3281), held in  
 19  
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21<sup>15</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 2-1 excerpt, A-Series PPP Loan  
 application, p. 52-82; Ex. 2-2 excerpt, US bank signature card, p. 83-86.

22<sup>16</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book 6 excerpt, p. 121, line  
 10.

23<sup>17</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book 6 excerpt, p. 121, line  
 23; Ex. 7-1, book Property Tracing excerpt, p. 125.

24<sup>18</sup> Watermelon Prevent Sale Motion, ECF No. 95-1, Ex. 7-1, book 6, p. 84, line 23; Ex. 7-1,  
 book Property Tracing, p. 89, line 289.

25<sup>19</sup> Watermelon Prevent Sale Motion, ECF No. 95-1, Ex. 7-1, book Property Tracing, p. 89,  
 line 280-293; Ex. 12-1 Trustee's Deed Upon Sale for 6033 Watermelon, p. 90-93; Ex. 12-2  
 Sale Documents for 6033 Watermelon, p. 94-108.

26<sup>20</sup> Ex. 7-1, book 4, line 30; Watermelon Prevent Sale Motion, ECF No. 95-1, Ex. 7-1, book  
 Property Tracing, p. 89, lines 292-293; Ex. 12-2 Sale Documents for 6033 Watermelon, p.  
 94-108.

27<sup>21</sup> Chinook Interlocutory Sale Motion, ECF No. 136-1, Ex. 3-1, PPP Loan Application, p.  
 2- 22.

1 the name of Nevada Design, LLC. Dezfooli had signatory authority for WF Account  
 2 x3281.<sup>22</sup>

3 After receiving the illegally obtained PPP loan proceeds, Dezfooli purchased four  
 4 cashier's checks totaling \$1,668,872.56 using funds from WF x3281.<sup>23</sup> One of those cashier's  
 5 checks, no. x1811, in the amount of \$790,406.21 was used to purchase 6116 Chinook Way,  
 6 Las Vegas, Nevada 89108 for \$228,000 at auction on behalf of Sanam Limited.<sup>24</sup> A  
 7 subsequent refund of \$562,406.21 was issued to Dezfooli that was deposited in WF x4756  
 8 held in the name of Sanam Limited.<sup>25</sup>

9 Dezfooli also purchased cashier's checks totaling \$770,000 from the fraudulently  
 10 obtained illegal proceeds in WF x3281.<sup>26</sup> Three of the cashier's checks totaling \$100,000,  
 11 x4915, x4916, and x4917, were used in the purchase of 890 Harbor Avenue.<sup>27</sup>

12 On or about July 31, 2020, Dezfooli purchased 890 Harbor Ave. at auction for  
 13 Sanam Limited for \$290,000.<sup>28</sup> Dezfooli used checks x6728 and x6729 from USB x4334  
 14 totaling \$200,000 and checks x4915, x4916, and x4917 from WF x3281 totaling \$100,000  
 15 for the purchase of the property.<sup>29</sup> Escrow issued a refund of \$10,000<sup>30</sup> that was deposited in  
 16 WF x4756 held in the name of Sanam Limited.<sup>31</sup>

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 19 <sup>22</sup> Chinook Interlocutory Sale Motion, ECF No. 136-1, Ex. 4-1, WFB Account x3281  
 signature cards, p. 23-30; Ex. 7-1, book 1, p. 36, line 265.

20 <sup>23</sup> Chinook Interlocutory Sale Motion, ECF No. 136-1, Ex. 7-1, book 1, p. 36, line 268; Ex.  
 21 7-1, book 2, p. 40, lines 16-20; Ex. 7-1, book Property Tracing, p. 42; Ex. 8-1, Trustee's  
 Deed Upon Sale, p. 43-46; Ex. 8-2, Cashier's Check No. x1811, p. 48.

22 <sup>24</sup> Chinook Interlocutory Sale Motion, ECF No. 136-1, Ex. 7-1, book 2, p. 40, line 16; Ex. 7-  
 1, book Property Tracing, p. 42.

23 <sup>25</sup> Ex. 7-1, book 4, line 11; Chinook Interlocutory Sale Motion, ECF No. 136-1, Ex. 7-1,  
 book Property Tracing, line 33.

24 <sup>26</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book 1 excerpt, p. 117, line  
 267; book 2, p. 119, lines 6-7, 10; book property tracing, p.125.

25 <sup>27</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book 2 excerpt, p. 119, lines 6-  
 7, 10; book property tracing, p. 125.

26 <sup>28</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 13-1, Clark County Deed for sale  
 of 890 Harbor Ave, p. 126-129.

27 <sup>29</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, book 2, p. 119, lines 6-7, 10; book 6, p.  
 121, line 23; Ex. 7-1, book property tracing excerpt, p. 125.

28 <sup>30</sup> Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book property tracing excerpt.

29 <sup>31</sup> Ex. 7-1, book 4, line 30; Harbor Ave. Prevent Sale Motion, ECF No. 93-1, Ex. 7-1, book  
 Property Tracing, p. 125, line 33.

1           On May 12, 2020, Dezfooli purchased cashier's check (no. x1812) of \$868,466.35  
 2 from fraudulently obtained illegal proceeds in WF x3281.<sup>32</sup> Dezfooli purchased 180 Ruby  
 3 Ridge Avenue at auction on behalf of Sanam Limited for \$310,401, using cashier's check  
 4 no. x1812 to purchase the property.<sup>33</sup> The escrow agent subsequently issued a refund of  
 5 \$558,065.35 that was deposited in WF x4756.<sup>34</sup>

6           On September 3, 2020, Dezfooli purchased a cashier's check (no. x5116) on behalf of  
 7 Nevada Sales Limited for \$50,000 from the fraudulently obtained illegal proceeds in WF  
 8 x4756.<sup>35</sup> On September 14, 2020, Dezfooli purchased cashier's checks (nos. x1834 and  
 9 x5138) of \$200,000 and \$100,000 from fraudulently obtained illegal proceeds in WF  
 10 Account x3281 for Nevada Sales Limited.<sup>36</sup> The three cashier's checks were used to  
 11 purchase 1829 La Calera for \$327,224.35.<sup>37</sup> A subsequent refund of \$22,775.65 was issued  
 12 to Dezfooli and deposited into WF x4756.<sup>38</sup>

13           On December 21, 2020, Dezfooli purchased cashier's checks from the fraudulently  
 14 obtained illegal proceeds in WF x3281, nos. x5363 and x5364, for \$50,000 each.<sup>39</sup> On  
 15 February 4, 2021, Dezfooli purchased cashier's checks, nos. x1862 and x1864 from the  
 16 fraudulently obtained illegal proceeds in WF x4756 for \$200,000 each.<sup>40</sup> The four cashier's  
 17 checks were used to purchase 176 Glen Falls Avenue, Henderson, Nevada 89002 (176 Glen  
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21           <sup>32</sup> La Calera Prevent Sale Motion, ECF No, 60-1, Ex. 7-1, book 2, p. 50, line 17.

22           <sup>33</sup> SCI, ECF No. 97, p. 11; La Calera Prevent Sale Motion, ECF No, 60-1, Ex. 7-1, book 1,  
 p. 46, line 268; Ex. 7-1, book 2, p. 50, line 17; Ex. 7-1, book property tracing, p. 58.

23           <sup>34</sup> SCI, ECF No. 97, p. 11; Ex. 7-1, book 4, line 9; La Calera Prevent Sale Motion, ECF  
 No, 60-1, Ex. 7-1, book property tracing, p. 58.

24           <sup>35</sup> La Calera Prevent Sale Motion, ECF No, 60-1, Ex. 7-1, book 4, p. 52, line 27; Ex. 7-1,  
 book 5, p. 54, line 27.

25           <sup>36</sup> La Calera Prevent Sale Motion, ECF No, 60-1, Ex. 7-1, book 1, p. 48, line 396; Ex. 7-1,  
 book 2, p. 50, lines 48-49; Ex. 7-1, book property tracing, p. 59.

26           <sup>37</sup> La Calera Prevent Sale Motion, ECF No, 60-1, Ex. 7-1, book property tracing, p. 59;  
 Exs. 11-1, 11-2, 11-3, p. 61-72.

27           <sup>38</sup> Ex. 7-1, book 4, line 58.

28           <sup>39</sup> Ex. 7-1, book 1, line 477; Ex. 7-1, book 2, lines 62-63, 67; Ex. F, Receipt of Funds; Ex. G,  
 Cashier's Checks.

<sup>40</sup> Ex. 7-1, book 4, line 100; Ex. 7-1, book 5 lines 40, 42, 45; Ex. F, Receipt of Funds; Ex. G,  
 Cashier's Checks.

1 Falls) for \$452,000 at public auction. A subsequent refund of \$48,000 was issued to Dezfooli  
 2 and deposited into WFB x4756.<sup>41</sup>

3 On June 22, 2022, a Grand Jury returned an Eight-Count Criminal Indictment  
 4 charging Dezfooli with bank fraud, concealment money laundering, and monetary  
 5 transactions in criminally derived property.<sup>42</sup> On December 12, 2023, a Ten-Count  
 6 Superseding Criminal Indictment was returned charging Dezfooli with three counts of bank  
 7 fraud in violation of 18 U.S.C. § 1344(2), three counts of concealment money laundering in  
 8 violation of 18 U.S.C. § 1956(a)(1)(B)(i), and four counts of monetary transactions in  
 9 criminally derived property in violation of 18 U.S.C. § 1957.<sup>43</sup> At his arraignment, Dezfooli  
 10 plead not guilty to all ten Counts.<sup>44</sup>

11 In the Superseding Criminal Indictment, forfeiture is alleged under 18 U.S.C.  
 12 § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c);  
 13 and 18 U.S.C. § 982(a)(1) and 982(a)(2)(A) and identified 176 Glen Falls, four other real  
 14 properties, a 2021 Tesla, and a 2021 Bentley as forfeitable property, and criminal forfeiture  
 15 money judgments of at least \$11,231,186.52, \$2,303,872.56, and \$965,276.11.<sup>45</sup>

16 The Jury trial commenced on August 26, 2024, and the Jury found Dezfooli guilty  
 17 on all Ten Counts of the Superseding Indictment. The Jury also determined there was  
 18 requisite nexus between property set forth in the Forfeiture Allegations of the Superseding  
 19 Criminal Indictment and the offenses to which Meelad Dezfooli was found guilty.<sup>46</sup>

20 A records search on 176 Glen Falls from the Clark County Recorder's website  
 21 reveals that the Clark County Treasurer recorded a Tax Certificate for Delinquent Taxes on  
 22 January 3, 2023.<sup>47</sup> A property inquiry of 176 Glen Falls from the Clark County Treasurer's

23 <sup>41</sup> Ex. F, Receipt of Funds; Ex. G, Cashier's Checks; Ex. H, Deed Upon Sale; Ex. I,  
 24 Refund Check; Ex. 7-1, book 4, line 224.

25 <sup>42</sup> Criminal Indictment, ECF No. 1; Minutes of Proceedings, ECF No. 3.

26 <sup>43</sup> SCI, ECF No. 97.

27 <sup>44</sup> Court Minutes - Arraignment & Plea, ECF No. 104.

28 <sup>45</sup> SCI, ECF No. 97, p. 16-21.

<sup>46</sup> Minutes of Jury Trial Day 7, ECF No. 239; Minutes of Jury Trial Day 8, ECF No. 240;  
 Jury Verdict, ECF No. 243; Forfeiture Jury Instructions and Special Verdict Forms, ECF  
 No. 246.

<sup>47</sup> Glen Falls Prevent Sale Motion, ECF No. 231-1, Ex. C, Clark County Recorder Property  
 Search for 176 Glen Falls, p. 16.

1 website reveals that taxes have not been paid since March 2021 and unpaid taxes, interest,  
 2 penalties, and fees have accrued to \$17,359.84 as of August 20, 2024.

3 On July 22, 2024, the United States Attorney's Office received a cover letter from  
 4 Red Rock Financial Services with a copy of the Notice of Default and Election to Sell 176  
 5 Glen Falls issued by Paradise Hills Landscape Maintenance Association, Inc. (Paradise  
 6 Hills HOA).<sup>48</sup> An amount of \$2,903.96 is owed for unpaid HOA fees as of July 9, 2024,  
 7 excluding additional accruing assessments, interests, costs, and fees.<sup>49</sup>

8 To protect and preserve its forfeiture interests in 176 Glen Falls, the United States  
 9 filed a Motion to prevent the Clark County Treasurer from pursuing a tax sale and to  
 10 prevent Paradise Hills HOA from proceeding with a HOA default foreclosure sale on 176  
 11 Glen Falls<sup>50</sup> and this Court granted the Motion.<sup>51</sup>

12 Besides the unpaid taxes and the HOA default, additional liens have been placed  
 13 against the property that further reduces the property's value.<sup>52</sup> The Henderson Police  
 14 Department recently went out to this property because of a shooting and four squatters fled  
 15 the area and another possible squatter claimed to rent it but could not produce the lease.  
 16 Afterwards, the HPD notified the United States of these problems. These issues increase  
 17 risks, liability, and damages and further decreasing its value.

18 **II. ARGUMENT**

19 This Court has authority to issue the Interlocutory Order of Sale. "At any time  
 20 before entry of a final forfeiture order, the court, in accordance with Supplemental Rule  
 21 G(7) of the Federal Rules of Civil Procedure, may order the interlocutory sale of property  
 22 alleged to be forfeitable."<sup>53</sup>

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25 <sup>48</sup> Glen Falls Prevent Sale Motion, ECF No. 231-1, Ex. E, Notice of Default and Election to  
 26 Sell 176 Glen Falls, p. 21-25.

26 <sup>49</sup> *Id.*

27 <sup>50</sup> Glen Falls Prevent Sale Motion, ECF No. 231.

27 <sup>51</sup> Order Granting the Glen Falls Prevent Sale Motion, ECF No. 258.

28 <sup>52</sup> Glen Falls Prevent Sale Motion, ECF No. 231-1, Ex. C, Clark County Recorder, Property  
 Search for 176 Glen Falls, p. 16.

<sup>53</sup> Fed. R. Crim. P. 32.2(b)(7).

1 Only one of the grounds for interlocutory sale is required since Supplemental Rule  
 2 G(7)(b) is disjunctive.<sup>54</sup>

3 On motion by a party or a person having custody of the property, the  
 4 court may order all or part of the property sold if: (A) the property is  
 5 perishable or at risk of deterioration, decay, or injury by being detained  
 6 in custody pending the action; (B) the expense of keeping the property  
 7 is excessive or is disproportionate to its fair market value; (C) the  
 8 property is subject to a mortgage or to taxes on which the owner is in  
 9 default; or (D) the court finds other good cause.<sup>55</sup>

10 Under Supplemental Rule G(7)(b), this case meets four grounds for issuing an Order  
 11 for an Interlocutory Sale: (1) the property is at risk of deterioration, decay, damage, and  
 12 injury as time passes; (2) the expense of keeping the property will become disproportionate  
 13 to its fair market value because it is subject to taxes, its fees, HOA fees, assessments, special  
 14 assessment, late fees, interest, penalties, and their continual accrual against the real  
 15 property's value; (3) the property is in default to taxes and HOA fees due to unpaid taxes,  
 16 and HOA assessments; and (4) the court finds other good cause: (a) the value of the  
 17 property depreciates as mortgage interest rates have increased; (b) unpaid taxes and fees  
 18 will continue to accrue and need to be paid; and (c) HOA fees will continue to accrue and  
 19 need to be paid.<sup>56</sup>

20 The accruing non-payments of the taxes, its fees, HOA fees, assessments, special  
 21 assessment, late fees, interest, penalties, additional liens, shooting, and squatters are  
 22 decreasing the property's equity. In *479 Tamarind Drive*, the court granted the interlocutory  
 23 sale because the property had “[m]ore than \$40,437.55 in taxes... currently due... raising  
 24 the risk that the County may move to impose a lien and thereby diminish the property's

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 26<sup>54</sup> See *Shelter Cove Marina, Ltd. v. M/Y ISABELLA*, No. 3:17-cv-01578-GPC-BLM, 2017 WL  
 27 5906673, 2 (S.D. Cal. Nov. 30, 2017) (explaining that another Supplemental Rule for  
 28 interlocutory sale with similar language is disjunctive); *Cal. Yacht Marina-Chula Vista, LLC v. S/V OPILY*, No. 14-cv-1215-BAS-BGS, 2015 WL 1197540, 2 (S.D. Cal. Mar. 16, 2015) (explaining the same).

<sup>55</sup> Supp. R. G(7)(b) (paragraphs omitted).

<sup>56</sup> Supplemental Rule G(7)(b); Fed. R. Crim. P. 32.2(b)(7); see *United States v. One Parcel of Real Prop. Described as Lot 41, Berryhill Farm Estates*, 128 F.3d 1386, 1389–90 (10th Cir. 1997) (explaining the district court orders an interlocutory sale when the property is deteriorating and decaying). See *United States v. All Right, Title & Interest in Prop., Appurtenances, & Improvements Known as 479 Tamarind Drive, Hallendale, Fla.*, 98 CIV. 2279 DLC, 2012 WL 3886698, 2 (S.D.N.Y. Sept. 7, 2012) (explaining that interlocutory sale order was granted because of past due taxes would lower the value of the real property).

1 value to the Government should this forfeiture action succeed.”<sup>57</sup> The property’s value of  
 2 176 Glen Falls is decreasing rapidly. Additionally, property damage by potential squatters  
 3 will further decline the property’s value.

4 In *Fisch*, the interlocutory sale was granted due to the accumulation of past due  
 5 taxes.<sup>58</sup> The *Fisch* property was substitute property and was divisible with the defendant’s  
 6 wife.<sup>59</sup> In this case, the property was purchased with illegal proceeds and is subject to  
 7 forfeiture after any liens and fees are paid.

8 If an accident occurred on the property or the property is damaged in any way by  
 9 squatters, that would further cut into the property’s equity. The risk of accident and  
 10 damages on the property immediately increases when occupants are involved, as in this  
 11 case. The government seeks to preserve as much of the equity as.<sup>60</sup> The sale proceeds of 176  
 12 Glen Falls will be the “substitute res subject to forfeiture in place of the property that was  
 13 sold [, and] the proceeds must be in an interest-bearing account maintained by the United  
 14 States pending the conclusion of the forfeiture action.”<sup>61</sup>

15 “A sale must be made by a United States agency that has authority to sell the  
 16 property, *by the agency’s contractor*, or by any person the court designates.”<sup>62</sup> If the Court  
 17 grants this Motion, the United States recommends this Court authorize Doug Sawyer to sell  
 18 the property under “28 U.S.C. §§ 2001, 2002, and 2004.”<sup>63</sup>

### 19 III. JUDICIAL SALES PROCEDURE

20 If a court orders an interlocutory sale of property over the objection of any interested  
 21 party, the sale must comply with the provisions of 28 U.S.C. §§ 2001 and 2002. These  
 22

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23 <sup>57</sup> *United States v. All Right, Title & Interest in Prop., Appurtenances, & Improvements Known as 479*  
*Tamarind Drive, Hallendale, Fla.*, 98 CIV. 2279 DLC, 2012 WL 3886698, 2 (S.D.N.Y. Sept.  
 7, 2012).

24 <sup>58</sup> *United States v. Fisch*, No. H-11-722, 2016 WL 4702588 (S.D. Tex. Sep. 8, 2016).

25 <sup>59</sup> *Id.*

26 <sup>60</sup> *United States v. Haley*, No. 11-CR-0540-WDQ, 2011 WL 6202787, 1 (D. Md. Dec. 8,  
 2011) (granting the interlocutory sale to avoid liability for accidents and to “avoid falling in  
 arrears on the payment of applicable property taxes.”).

27 <sup>61</sup> Supplemental Rule G(7)(b)(iv) (brackets added); *United States v. King*, No. 10 CR. 122  
 (JGK), 2010 WL 4739791, 4 (S.D.N.Y. Nov. 12, 2010).

28 <sup>62</sup> Supplemental Rules G(7)(b)(ii) (emphasis added).

<sup>63</sup> Supplemental Rules G(7)(b)(iii).

1 statutes provide procedural safeguards to ensure that court-ordered sales are made on terms  
2 that best preserve the parties' interests. Section 2001(a) authorizes public sales of property  
3 and sales by court-appointed receivers. Section 2001(b) permits private sales of property for  
4 cash or other consideration after a hearing of which notice to all interested parties shall be  
5 given by publication, or as otherwise directed by the court, and after the court finds that the  
6 best interests of the estate will be conserved thereby.

7 Through this Motion, the United States requests authorization to proceed with a  
8 private sale of the above-listed property. Based upon the reasons set forth herein, the United  
9 States believes that a prompt sale of the property by the United States, followed promptly by  
10 releasing the proceeds to the United States affords the best protection to all concerned. The  
11 United States believes that a private sale versus a public sale will allow the United States the  
12 discretion to sell the properties in the most commercially feasible manner and maintain the  
13 most value.

14 As required by 28 U.S.C. § 2001(b), notice of the Government's Motion must be  
15 given by publication or otherwise as this Court directs. The sale of the property through the  
16 multiple listing service and other major internet websites for real property meets the  
17 requirements of 18 U.S.C. §§ 2001, 2002, and 2004.

18 Under 28 U.S.C. § 2001(b), three disinterested persons must appraise the properties.  
19 To meet that requirement, the United States has obtained the following neutral appraisal  
20 estimates as of September 12, 2024:

- 21 1. Zillow.com for \$672,300;
- 22 2. Realtor.com for \$622,944; and
- 23 3. Redfin.com for \$584,573.

### III. CONCLUSION

For the foregoing reasons, this Court should order the Interlocutory Sale of 176 Glenn Falls Avenue, Henderson, Nevada 89002 and to authorize Doug Sawyer as the designated real estate agent to sell it.

Dated: September 16, 2024.

Respectfully submitted,

JASON M. FRIERSON  
United States Attorney

/s/ Daniel D. Hollingsworth  
DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

IT IS SO ORDERED:

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CRISTINA D. SILVA  
UNITED STATES DISTRICT JUDGE

Dated: September 16, 2024

1 JASON M. FRIERSON  
2 United States Attorney  
3 Nevada Bar Number 7709  
4 DANIEL D. HOLLINGSWORTH  
5 Assistant United States Attorney  
6 Nevada Bar No. 1925  
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*Attorneys for the United States*

7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10	UNITED STATES OF AMERICA,	2:22-CR-142-CDS-DJA
11	Plaintiff,	<b>Index of Exhibits</b>
12	v.	
13	MEELAD DEZFOOLI,	
14	Defendant.	
15	Exhibit 7-1, book 1 .....	WF x3281 LIBR Analysis (Excerpt)
16	Exhibit 7-1, book 2 .....	WF x3281 Cashier's Checks (Excerpt)
17	Exhibit 7-1, book 4 .....	WF x4756 LIBR Analysis (Excerpt)
18	Exhibit 7-1, book 5 .....	WF x4756 Cashier's Checks (Excerpt)
19	Exhibit F .....	Receipt of Funds for 176 Glen Falls
20	Exhibit G .....	Cashier's Checks to Purchase 176 Glen Falls
21	Exhibit H .....	Deed Upon Sale for 176 Glen Falls
22	Exhibit I .....	Refund Check from Purchase of 176 Glen Falls
23		
24		
25		
26		
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1 Exhibit 7-1, book 1 – WF x3281 LIBR Analysis (Excerpt)  
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Exhibit 7-1, book 1 – WF x3281 LIBR Analysis (Excerpt)

Current as of 11/14/2022

A	B	C	D	E	F	G	H	K	M	N	O	P	Q	R					
1	Nevada Design LLC	Top of Summary							Combined Transactions			Other Funds		Criminal Proceeds					
2	Wells Fargo Bank	Go To 05/11/2020 LIBR Analysis																	
3	Account# x3281																		
4	Opened 9/13/2019 - Meelad Dezfooli																		
5	09/03/2020 - Meelad Dezfooli, Manouchehr Dezfooli																		
6																			
7	Acct Info	Date	Description	Agent Notes	Check #	Deposit	Withdrawals	Balance	Memo	Deposit	Withdrawals	Balance	Deposit	Withdrawals	Balance				
264	WFB x3281	5/8/2020	Zelle - to Payment Loan			\$ 400.00	\$ 2,933.14			\$ 400.00	\$ 2,933.14				\$ 8,672,800.00				
265	WFB x3281	5/11/2020	Nevada Sales Limited - PPP Loan			\$ 8,672,800.00	\$ 8,675,733.14			\$ 8,675,733.14	\$ 8,672,800.00				\$ 8,672,800.00				
266	WFB x3281	5/11/2020	Transfer to A Series LLC - WFB x1636			\$ 165,000.00	\$ 8,510,733.14			\$ 2,933.14	\$ -		\$ 162,066.86	\$ 8,510,733.14					
267	WFB x3281	5/12/2020	Withdrawal for Purchase of Cashier's Checks			\$ 770,000.00	\$ 7,740,733.14			\$ -			\$ 770,000.00	\$ 7,740,733.14					
268	WFB x3281	5/12/2020	Withdrawal for Purchase of Cashier's Checks			\$ 1,668,872.56	\$ 6,071,860.58			\$ -			\$ 1,668,872.56	\$ 6,071,860.58					
269	WFB x3281	5/12/2020	Withdrawal			\$ 5,040.00	\$ 6,066,820.58			\$ -			\$ 5,040.00	\$ 6,066,820.58					
270	WFB x3281	5/14/2020	Arco			\$ 4.34	\$ 6,066,816.24			\$ -			\$ 4.34	\$ 6,066,816.24					
271	WFB x3281	5/15/2020	Synchrony Bank CC Pymt			\$ 3,908.08	\$ 6,062,908.16	For Manouchehr Dezfooli		\$ -			\$ 3,908.08	\$ 6,062,908.16					
272	WFB x3281	5/18/2020	Adobe Acropo Subs			\$ 14.99	\$ 6,062,893.17			\$ -			\$ 14.99	\$ 6,062,893.17					
273	WFB x3281	5/18/2020	Smiths Food			\$ 22.73	\$ 6,062,870.44			\$ -			\$ 22.73	\$ 6,062,870.44					
274	WFB x3281	5/18/2020	Smiths Food Cash Back 100.00			\$ 116.77	\$ 6,062,753.67			\$ -			\$ 116.77	\$ 6,062,753.67					
275	WFB x3281	5/18/2020	Best Buy Flooring		2319	\$ 7,209.65	\$ 6,055,544.02			\$ -			\$ 7,209.65	\$ 6,055,544.02					
276	WFB x3281	5/20/2020	Epx Merch Sett			\$ 96.74	\$ 96.74			\$ 96.74					\$ 6,055,544.02				
277	WFB x3281	5/22/2020	Jack in the Box			\$ 10.37	\$ 6,055,630.39			\$ 10.37	\$ 86.37				\$ 6,055,630.39				
278	WFB x3281	5/26/2020	Robinhood Funds 7731 Meelad Dezfooli			\$ 39,958.29	\$ 6,015,672.18			\$ 86.37	\$ -		\$ 39,871.92	\$ 6,015,672.18					
279	WFB x3281	5/29/2020	Epx Merch Sett			\$ 96.78	\$ 6,015,768.88			\$ 96.78	\$ 96.78				\$ 6,015,768.88				
280	WFB x3281	5/29/2020	Zelle - to Dez S			\$ 499.99	\$ 6,015,268.89			\$ 96.78	\$ -				\$ 6,015,268.89				
281	WFB x3281	6/1/2020	Epx Merch Sett			\$ 11,777.75	\$ 6,027,046.64			\$ 11,777.75					\$ 6,015,268.89				
282	WFB x3281	6/1/2020	Costco Gas			\$ 34.49	\$ 6,027,012.15			\$ 34.49	\$ 11,743.26				\$ 6,015,268.89				
283	WFB x3281	6/1/2020	McDonalds			\$ 8.01	\$ 6,027,004.14			\$ 8.01	\$ 11,735.25				\$ 6,015,268.89				
284	WFB x3281	6/1/2020	Withdrawal for Purchase of Cashier's Checks			\$ 702,200.00	\$ 5,324,804.14			\$ 11,735.25	\$ -		\$ 690,464.75	\$ 5,324,804.14					
285	WFB x3281	6/1/2020	Epx Merch Sett			\$ 6.97	\$ 5,324,797.17			\$ -			\$ 6.97	\$ 5,324,797.17					
286	WFB x3281	6/2/2020	McDonalds			\$ 3.24	\$ 5,324,793.93			\$ -			\$ 3.24	\$ 5,324,793.93					
287	WFB x3281	6/2/2020	Tropical Smoothie			\$ 23.80	\$ 5,324,770.13			\$ -			\$ 23.80	\$ 5,324,770.13					
288	WFB x3281	6/2/2020	Costco Gas			\$ 34.34	\$ 5,324,735.79			\$ -			\$ 34.34	\$ 5,324,735.79					
289	WFB x3281	6/2/2020	Epx Merch Sett			\$ 72.90	\$ 5,324,662.88			\$ -			\$ 72.90	\$ 5,324,662.88					
290	WFB x3281	6/2/2020	Robinhood Funds 7731 Meelad Dezfooli			\$ 49,821.86	\$ 5,274,841.03			\$ -			\$ 49,821.86	\$ 5,274,841.03					
291	WFB x3281	6/3/2020	Parking McCarr			\$ 24.00	\$ 5,274,817.03			\$ -			\$ 24.00	\$ 5,274,817.03					
292	WFB x3281	6/3/2020	Jack in the Box			\$ 8.53	\$ 5,274,808.50			\$ -			\$ 8.53	\$ 5,274,808.50					
293	WFB x3281	6/3/2020	Floor and Décor			\$ 108.35	\$ 5,274,700.15			\$ -			\$ 108.35	\$ 5,274,700.15					
294	WFB x3281	6/3/2020	Smiths Food Cash Back 100.00			\$ 138.17	\$ 5,274,561.98			\$ -			\$ 138.17	\$ 5,274,561.98					
295	WFB x3281	6/4/2020	Arco			\$ 8.06	\$ 5,274,553.92			\$ -			\$ 8.06	\$ 5,274,553.92					
296	WFB x3281	6/5/2020	Epx Merch Sett			\$ 1,797.16	\$ 5,276,351.08			\$ 1,797.16					\$ 5,274,553.92				
297	WFB x3281	6/5/2020	Wholefuds			\$ 39.06	\$ 5,276,312.02			\$ 39.06	\$ 1,758.10				\$ 5,274,553.92				
298	WFB x3281	6/8/2020	S & S			\$ 46.46	\$ 5,276,265.56			\$ 46.46	\$ 1,711.64				\$ 5,274,553.92				
299	WFB x3281	6/8/2020	S & S			\$ 41.42	\$ 5,276,224.14			\$ 41.42	\$ 1,670.22				\$ 5,274,553.92				
300	WFB x3281	6/9/2020	Robinhood Funds 7731 Meelad Dezfooli			\$ 48,250.39	\$ 5,227,973.75			\$ 1,670.22	\$ -				\$ 5,227,973.75				
301	WFB x3281	6/11/2020	Costco Gas			\$ 16.16	\$ 5,227,957.59			\$ -					\$ 5,227,957.59				
302	WFB x3281	6/15/2020	Epx Merch Sett			\$ 211.04	\$ 5,228,168.63			\$ 211.04					\$ 5,227,957.59				
303	WFB x3281	6/15/2020	Rubios			\$ 12.00	\$ 5,228,156.63			\$ 12.00	\$ 199.04				\$ 5,227,957.59				
304	WFB x3281	6/15/2020	ATM WD			\$ 700.00	\$ 5,227,456.63			\$ 199.04	\$ -				\$ 5,227,456.63				
305	WFB x3281	6/15/2020	Withdrawal of Cashier's Checks & Cash			\$ 8,637.94	\$ 5,218,818.68			\$ -					\$ 5,218,818.68				
306	WFB x3281	6/16/2020	Epx Merch Sett			\$ 119.77	\$ 5,218,838.46			\$ 119.77					\$ 5,218,838.46				
307	WFB x3281	6/16/2020	The Legacy Estates (NE)			\$ 833.03	\$ 5,218,105.43			\$ 119.77					\$ 5,218,105.43				
308	WFB x3281	6/16/2020	Adobe Acropo Subs			\$ 14.99	\$ 5,218,090.44			\$ -			\$ 14.99	\$ 5,218,090.44					
309	WFB x3281	6/16/2020	NV DMV			\$ 51.00	\$ 5,218,039.44			\$ -			\$ 51.00	\$ 5,218,039.44					
310	WFB x3281	6/16/2020	Smogbusters Store			\$ 24.00	\$ 5,218,015.44			\$ -			\$ 24.00	\$ 5,218,015.44					
311	WFB x3281	6/17/2020	Taxoco			\$ 47.47	\$ 5,217,967.97			\$ -			\$ 47.47	\$ 5,217,967.97					
312	WFB x3281	6/18/2020	Epx Merch Sett			\$ 599.30	\$ 5,218,567.27			\$ 599.30					\$ 5,217,967.97				
313	WFB x3281	6/18/2020	Withdrawal for Purchase of Cashier's Checks			\$ 833,211.13	\$ 4,385,356.14			\$ 599.30	\$ -				\$ 4,385,356.14				
314	WFB x3281	6/22/2020	Epx Merch Sett			\$ 0.70	\$ 4,385,355.44			\$ -			\$ 0.70	\$ 4,385,355.44					
315	WFB x3281	6/24/2020	City of Henderson			\$ 150.00	\$ 4,385,205.44			\$ -			\$ 150.00	\$ 4,385,205.44					
316	WFB x3281	6/25/2020	Robinhood Funds 7731 Meelad Dezfooli			\$ 49,969.46	\$ 4,335,235.98			\$ -			\$ 49,969.46	\$ 4,335,235.98					
317	WFB x3281	6/29/2020	Epx Merch Sett			\$ 1,349.10	\$ 4,336,585.08			\$ 1,349.10					\$ 4,336,585.08				
318	WFB x3281	6/29/2020	Jack in the Box			\$ 5.61	\$ 4,336,579.47			\$ 5.61	\$ 1,343.49				\$ 4,336,579.47				
319	WFB x3281	6/29/2020	Costco Gas			\$ 34.40	\$ 4,336,545.07			\$ 34.40	\$ 1,309.09				\$ 4,336,545.07				
320	WFB x3281	6/30/2020	Louis Vuitton			\$ 2,204.95	\$ 4,334,340.12			\$ 1,309.09	\$ -				\$ 4,334,340.12				
321	WFB x3281	6/30/2020	Epx Merch Sett			\$ 5.47	\$ 4,334,334.65			\$ -			\$ 5.47	\$ 4,334,334.65					
322	WFB x3281	6/30/2020	Robinhood Funds 7731 Meelad Dezfooli			\$ 37,000.00	\$ 4,294,734.65			\$ -			\$ 37,000.00	\$ 4,294,734.65					
323	WFB x3281	7/1/2020	Whitehead Burnett			\$ 2,500.00	\$ 4,294,834.65			\$ -			\$ 2,500.00	\$ 4,294,834.65					
324	WFB x3281	7/1/2020	Epx Merch Sett			\$ 195.91	\$ 4,294,638.74			\$ -			\$ 195.91	\$ 4,294,638.74					
325	WFB x3281	7/2/2020	NV DMV			\$ 739.00	\$ 4,293,899.74			\$ -			\$ 739.00	\$ 4,293,899.74					
326	WFB x3281	7/2/2020	Chk to: [REDACTED] (June 15-30 2020)		2320	\$ 9,360.81	\$ 4,284,538.93			\$ -			\$ 9,360.81	\$ 4,284,538.93					
327	WFB x3281	7/2/2020	Chk to: [REDACTED] (June 15-30 2020)		2321	\$ 8,476.25	\$ 4,276,062.68			\$ -			\$ 8,476.25	\$ 4,276,062.68					
328	WFB x3281	7/2/2020	Chk to: Meelad Dezfooli (June 15-30 2020)		2322	\$ 8,980.76	\$ 4,267,081.92			\$ -			\$ 8,980.76	\$ 4,267,081.92					
329	WFB x3281	7/3/2020	Mercedes Benz			\$ 81.82	\$ 4,267,000.10			\$ -			\$ 81.82	\$ 4,267,000.10					
330	WFB x3281	7/3/2020	Robinhood Funds 7731 Meelad Dezfooli			\$ 50,000.00	\$ 4,217,000.10			\$ -			\$ 50,000.00	\$ 4,217,000.10					
3																			

Current as of 11/14/2022

Current as of 11/14/2022

A	B	C	D	E	F	G	H	K	M	N	O	P	Q	R	
1	Nevada Design LLC	Top of Summary								Other Funds		Criminal Proceeds			
2	Wells Fargo Bank	Go To 05/11/2020 LIBR Analysis								Combined Transactions					
3	Account# x3281														
4	Opened 9/13/2019 - Meelad Dezfooli														
5	09/03/2020 - Meelad Dezfooli, Manouchehr Dezfooli														
6															
7	Acct Info	Date	Description	Agent Notes	Check #	Deposit	Withdrawals	Balance	Memo	Deposit	Withdrawals	Balance	Deposit	Withdrawals	Balance
408	WFB x3281	10/5/2020	Epx Merch Sett			\$ 2,397.54		\$ 2,464,148.97		\$ 2,397.54		\$ 2,461,151.43			
409	WFB x3281	10/5/2020	Zelle - to Company Consulting				\$ 1,009.97	\$ 2,463,139.00			\$ 1,009.97	\$ 1,987.57			\$ 2,461,151.43
410	WFB x3281	10/6/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J3931)	2335		\$ 16,720.11	\$ 2,446,418.89			\$ 1,987.57	\$ -		\$ 14,732.54	\$ 2,446,418.89
411	WFB x3281	10/6/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J3932)	2336		\$ 19,250.00	\$ 2,427,168.89			\$ -		\$ 19,250.00	\$ 2,427,168.89	
412	WFB x3281	10/7/2020	to Wells Fargo CC 7053			\$ 25,000.00	\$ 2,402,168.89						\$ 25,000.00	\$ 2,402,168.89	
413	WFB x3281	10/8/2020	Epx Merch Sett			\$ 150.69		\$ 2,402,319.58		\$ 150.69		\$ 2,402,168.89			\$ 2,402,168.89
414	WFB x3281	10/8/2020	Direct Pay Monthly Base				\$ 10.00	\$ 2,402,309.58			\$ 10.00	\$ 140.69			\$ 2,392,309.58
415	WFB x3281	10/8/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 2,352,309.58			\$ 140.69	\$ -		\$ 49,859.31	\$ 2,352,309.58
416	WFB x3281	10/9/2020	A&K Drywall and Paint LLC		2339		\$ 40,000.00	\$ 2,312,309.58						\$ 40,000.00	\$ 2,312,309.58
417	WFB x3281	10/14/2020	Epx Merch Sett			\$ 2,026.51		\$ 2,314,336.09		\$ 2,026.51		\$ 2,026.51			\$ 2,275,128.50
418	WFB x3281	10/14/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J3960)	2337		\$ 39,207.59	\$ 2,275,128.50			\$ 2,026.51	\$ -		\$ 37,181.08	\$ 2,275,128.50
419	WFB x3281	10/14/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 2,225,128.50						\$ 50,000.00	\$ 2,225,128.50
420	WFB x3281	10/15/2020	Epx Merch Sett			\$ 2,281.90		\$ 2,227,395.41			\$ 2,281.90				\$ 2,225,128.50
421	WFB x3281	10/16/2020	Adobe Acropo Subs				\$ 14.99	\$ 2,227,395.41				\$ 14.99			\$ 2,225,128.50
422	WFB x3281	10/19/2020	Epx Merch Sett			\$ 657.78		\$ 2,228,053.19			\$ 657.78				\$ 2,225,128.50
423	WFB x3281	10/21/2020	Epx Merch Sett			\$ 1,600.91		\$ 2,229,654.10			\$ 1,600.91				\$ 2,225,128.50
424	WFB x3281	10/22/2020	Epx Merch Sett			\$ 96.35		\$ 2,229,750.45			\$ 96.35				\$ 2,225,128.50
425	WFB x3281	10/22/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 2,179,750.45				\$ 4,621.95			\$ 2,179,750.45
426	WFB x3281	10/23/2020	Epx Merch Sett			\$ 0.63		\$ 2,179,749.82							\$ 0.63
427	WFB x3281	10/23/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J3996)	2338		\$ 29,006.90	\$ 2,150,742.92							\$ 29,006.90
428	WFB x3281	10/26/2020	Epx Merch Sett			\$ 97.78					\$ 97.78				\$ 2,150,742.92
429	WFB x3281	10/26/2020	Epx Merch Sett			\$ 98.99		\$ 2,150,839.69			\$ 98.99				\$ 2,150,742.92
430	WFB x3281	10/27/2020	Epx Merch Sett				\$ 0.39	\$ 2,150,839.30				\$ 0.39			\$ 2,150,742.92
431	WFB x3281	10/28/2020	Epx Merch Sett			\$ 4,390.37		\$ 2,155,329.67			\$ 4,390.37				\$ 2,150,742.92
432	WFB x3281	10/30/2020	Epx Merch Sett			\$ 96.71		\$ 2,155,426.38			\$ 96.71				\$ 2,150,742.92
433	WFB x3281	11/2/2020	Epx Merch Sett				\$ 2.98	\$ 2,155,423.42				\$ 2.98			\$ 2,150,742.92
434	WFB x3281	11/3/2020	Epx Merch Sett			\$ 96.35		\$ 2,155,519.75			\$ 96.35				\$ 2,150,742.92
435	WFB x3281	11/3/2020	Epx Merch Sett				\$ 75.56	\$ 2,155,444.19				\$ 75.56			\$ 2,150,742.92
436	WFB x3281	11/5/2020	Epx Merch Sett			\$ 6,013.14		\$ 2,161,457.33			\$ 6,013.14				\$ 2,150,742.92
437	WFB x3281	11/5/2020	Zelle - to Company Consulting				\$ 649.99	\$ 2,160,807.34				\$ 649.99			\$ 2,150,742.92
438	WFB x3281	11/5/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 2,110,807.34				\$ 10,064.42			\$ 39,935.58
439	WFB x3281	11/6/2020	City of Las Vegas				\$ 200.00	\$ 2,110,607.34							\$ 200.00
440	WFB x3281	11/6/2020	Epx Merch Sett			\$ 0.61		\$ 2,110,606.73							\$ 0.61
441	WFB x3281	11/6/2020	Zelle - to Staging Home			\$ 450.00		\$ 2,110,156.73							\$ 450.00
442	WFB x3281	11/9/2020	Direct Pay Monthly Base			\$ 10.00		\$ 2,110,146.73							\$ 10.00
443	WFB x3281	11/10/2020	Epx Merch Sett			\$ 100.35		\$ 2,110,046.38							\$ 100.35
444	WFB x3281	11/13/2020	Epx Merch Sett			\$ 1,200.94		\$ 2,111,247.32			\$ 1,200.94				\$ 2,110,046.38
445	WFB x3281	11/16/2020	Epx Merch Sett			\$ 257.03					\$ 257.03				\$ 2,110,046.38
446	WFB x3281	11/16/2020	Adobe Acropo Subs				\$ 14.99	\$ 2,111,489.36				\$ 14.99			\$ 2,110,046.38
447	WFB x3281	11/16/2020	Zelle - to Dez S				\$ 298.89	\$ 2,111,190.47				\$ 298.89			\$ 2,110,046.38
448	WFB x3281	11/17/2020	Epx Merch Sett			\$ 798.69		\$ 2,111,989.16			\$ 798.69				\$ 2,110,046.38
449	WFB x3281	11/17/2020	ATM WD				\$ 700.00	\$ 2,111,289.16				\$ 700.00			\$ 2,110,046.38
450	WFB x3281	11/17/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 2,061,289.16				\$ 1,242.78			\$ 48,757.22
451	WFB x3281	11/18/2020	Zelle - to Company Consulting				\$ 499.89	\$ 2,060,789.27							\$ 499.89
452	WFB x3281	11/20/2020	Epx Merch Sett			\$ 2,263.84		\$ 2,063,053.11			\$ 2,263.84				\$ 2,060,789.27
453	WFB x3281	11/23/2020	Epx Merch Sett			\$ 2,466.17		\$ 2,065,519.28			\$ 2,466.17				\$ 2,060,789.27
454	WFB x3281	11/23/2020	Epx Merch Sett			\$ 0.74		\$ 2,065,516.54			\$ 0.74				\$ 2,060,789.27
455	WFB x3281	11/25/2020	Epx Merch Sett			\$ 2,087.44					\$ 2,087.44				\$ 2,060,789.27
456	WFB x3281	11/27/2020	Zelle - to Company Consulting				\$ 2,500.00	\$ 2,065,105.91				\$ 2,500.00			\$ 2,060,789.27
457	WFB x3281	11/30/2020	Epx Merch Sett			\$ 4.97		\$ 2,065,101.01			\$ 4.97				\$ 2,060,789.27
458	WFB x3281	12/1/2020	Epx Merch Sett			\$ 217.05		\$ 2,064,883.96			\$ 217.05				\$ 2,060,789.27
459	WFB x3281	12/2/2020	Epx Merch Sett			\$ 4,870.82		\$ 2,069,754.78			\$ 4,870.82				\$ 2,060,789.27
460	WFB x3281	12/2/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J4119)	2340		\$ 19,208.30	\$ 2,050,546.48				\$ 8,965.51			\$ 10,242.79
461	WFB x3281	12/2/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 2,000,546.48							\$ 50,000.00
462	WFB x3281	12/3/2020	Centurylink				\$ 643.63	\$ 1,999,902.85							\$ 643.63
463	WFB x3281	12/3/2020	Centurylink				\$ 322.43	\$ 1,999,580.42							\$ 322.43
464	WFB x3281	12/3/2020	Centurylink				\$ 199.85	\$ 1,999,380.57							\$ 199.85
465	WFB x3281	12/4/2020	Epx Merch Sett			\$ 96.00		\$ 1,999,476.57			\$ 96.00				\$ 1,999,380.57
466	WFB x3281	12/8/2020	Direct Pay Monthly Base				\$ 10.00	\$ 1,999,466.57				\$ 10.00			\$ 1,999,380.57
467	WFB x3281	12/8/2020	Epx Merch Sett			\$ 0.23		\$ 1,999,466.34			\$ 0.23				\$ 1,999,380.57
468	WFB x3281	12/8/2020	Zelle - to Dez S				\$ 250.00	\$ 1,999,216.34				\$ 85.77			\$ 164.23
469	WFB x3281	12/9/2020	Zelle - to Company Consulting				\$ 1,499.99	\$ 1,997,716.35							\$ 1,499.99
470	WFB x3281	12/9/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J4148)	2343		\$ 42,460.83	\$ 1,955,255.52							\$ 42,460.83
471	WFB x3281	12/11/2020	Epx Merch Sett				\$ 1,639.58	\$ 1,956,895.10				\$ 1,639.58			\$ 1,955,255.52
472	WFB x3281	12/16/2020	Epx Merch Sett				\$ 4,167.13	\$ 1,961,062.23				\$ 4,167.13			\$ 1,955,255.52

Current as of 11/14/2022

A	B	C	D	E	F	G	H	K	M	N	O	P	Q	R	
1	Nevada Design LLC	Top of Summary							Other Funds			Criminal Proceeds			
2	Wells Fargo Bank	Go To 05/11/2020 LIBR Analysis							Combined Transactions						
3	Account# x3281														
4	Opened 9/13/2019 - Meelad Dezfooli														
5	09/03/2020 - Meelad Dezfooli, Manouchehr Dezfooli														
6															
7	Acct Info	Date	Description	Agent Notes	Check #	Deposit	Withdrawals	Balance	Memo	Deposit	Withdrawals	Balance	Deposit	Withdrawals	Balance
473	WFB x3281	12/16/2020	Adobe Acropo Subs				\$ 14.99	\$ 1,961,047.24			\$ 14.99	\$ 5,791.72			\$ 1,955,255.52
474	WFB x3281	12/17/2020	Epx Merch Setl				\$ 0.74	\$ 1,961,046.50			\$ 0.74	\$ 5,790.98			\$ 1,955,255.52
475	WFB x3281	12/18/2020	Epx Merch Setl			\$ 1,854.14		\$ 1,962,900.64		\$ 1,854.14		\$ 7,645.12			\$ 1,955,255.52
476	WFB x3281	12/21/2020	Epx Merch Setl				\$ 0.81	\$ 1,962,899.83			\$ 0.81	\$ 7,644.31			\$ 1,955,255.52
477	WFB x3281	12/21/2020	Withdrawal for Purchase of Cashier's Checks	See Tab 2 (F67)			\$ 1,409,209.65	\$ 553,690.18			\$ 7,644.31	\$ -		\$ 1,401,565.34	\$ 553,690.18
478	WFB x3281	12/21/2020	Withdrawal for Purchase of Cashier's Checks	See Tab 2 (F76)			\$ 144,320.24	\$ 409,369.94				\$ -		\$ 144,320.24	\$ 409,369.94
479	WFB x3281	12/21/2020	Chk to: Best Buy Flooring (dep into FSB x9591)	See Tab 9 (J4178)	2341		\$ 45,607.40	\$ 363,762.54				\$ -		\$ 45,607.40	\$ 363,762.54
480	WFB x3281	12/22/2020	to Wells Fargo CC 3734				\$ 24,399.99	\$ 339,362.55				\$ -		\$ 24,399.99	\$ 339,362.55
481	WFB x3281	12/28/2020	Withdrawal for Purchase of Cashier's Checks	See Tab 2 (F82)			\$ 30,515.13	\$ 308,847.42				\$ -		\$ 30,515.13	\$ 308,847.42
482	WFB x3281	12/29/2020	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 258,847.42				\$ -		\$ 50,000.00	\$ 258,847.42
483	WFB x3281	12/31/2020	NV Energy				\$ 344.57	\$ 258,502.85				\$ -		\$ 344.57	\$ 258,502.85
484	WFB x3281	12/31/2020	NV Energy				\$ 28.79	\$ 258,474.06				\$ -		\$ 28.79	\$ 258,474.06
485	WFB x3281	12/31/2020	NV Energy				\$ 151.87	\$ 258,322.19				\$ -		\$ 151.87	\$ 258,322.19
486	WFB x3281	12/31/2020	NV Energy				\$ 34.01	\$ 258,288.18				\$ -		\$ 34.01	\$ 258,288.18
487	WFB x3281	12/31/2020	Epx Merch Setl				\$ 15.97	\$ 258,272.21				\$ -		\$ 15.97	\$ 258,272.21
488	WFB x3281	1/4/2021	Epx Merch Setl				\$ 92.90	\$ 258,179.31				\$ -		\$ 92.90	\$ 258,179.31
489	WFB x3281	1/4/2021	Robinhood Funds 7731 Meelad Dezfooli				\$ 50,000.00	\$ 208,179.31				\$ -		\$ 50,000.00	\$ 208,179.31
490	WFB x3281	1/5/2021	Westenelite Com				\$ 1,538.20	\$ 206,641.11				\$ -		\$ 1,538.20	\$ 206,641.11

1 Exhibit 7-1, book 2 – WF x3281 Cashier's Checks (Excerpt)  
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28 Exhibit 7-1, book 2 – WF x3281 Cashier's Checks (Excerpt)

Current as of 11/14/2022

	A	D	E	F	G	H	I	J	K	L	M	P	Q
1	Purpose	CK date	CL date	Amount	CK NO/Serial #		Sequence #	CB, AU, Seq Num	Remitter	Purchaser	Payee	Endorsement/Negotiated Party	Memo
56	Baffetto	12/21/2020	1/20/2021	\$ 100,000.00	741805361		1187771254	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Sables LLC (check back cut off)	
57	Baffetto	12/21/2020	1/20/2021	\$ 100,000.00	741805362		1187771256	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Sables LLC (check back cut off)	
58	Baffetto	12/21/2020	1/20/2021	\$ 200,000.00	741801850		1187771258	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Sables LLC (check back cut off)	
59	Baffetto	12/21/2020	1/20/2021	\$ 200,000.00	741801851		1187771260	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Sables LLC (check back cut off)	
60	Dep 0900	12/21/2020	1/12/2021	\$ 300,000.00	741801852		1187771262	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Not Used for Purpose Intended	
61	Dove	12/21/2020	1/6/2021	\$ 300,000.00	741801853		1187771264	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Quality Loan Service Corp	
62	Glen Falls	12/21/2020	3/29/2021	\$ 50,000.00	741805363		1187771266	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Clear Recon Corp	090044-nn or 090099-W?
63	Glen Falls	12/21/2020	3/29/2021	\$ 50,000.00	741805364		1187771268	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Clear Recon Corp	090044-W
64	Unable to locate Sub	12/21/2020	12/21/2020	\$ 50,000.00	741805365		1187771270	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited		
65	Baffetto	12/21/2020	1/20/2021	\$ 50,000.00	741805366		1187771272	25 0007418 0121	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	Sables LLC (check back cut off)	
66				\$ 9,209.65	Cash								
67				\$ 1,409,209.65		8173	1187771253						
68					<a href="#">Back to x3281</a>								
69					<a href="#">Back to x4756</a>								

1 Exhibit 7-1, book 4 – WF x4756 LIBR Analysis (Excerpt)  
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Exhibit 7-1, book 4 – WF x4756 LIBR Analysis (Excerpt)

Current as of 11/14/2022

A	B	C	D	E	F	G	H	I	L	N	O	P	Q	R	S	
1	Sanam Limited															
2	Checking															
3	Wells Fargo Bank															
4	Account # x4756															
5	Opened 07/28/2020 - Meelad Dezfooli, 09/03/2020 - Manouchehr Dezfooli added															
6																
7	Date	Description	Agent Notes	Add'l Notes	Check #	Deposit	Withdrawals	Balance	Memo	Deposit	Withdrawals	Balance	Deposit	Withdrawals	Balance	
8		Beginning Balance						\$ -				\$ -			\$ -	
9	WFB x4756	7/28/2020 Edeposit - Quality Loan Service Corp	180 Ruby Ridge		13518	\$ 558,065.35	\$ 558,065.35	NV-14-613424-AB				\$ 558,065.35			\$ 558,065.35	
10	WFB x4756	7/31/2020 Interest				\$ 0.61	\$ 558,065.96					\$ 0.61			\$ 558,065.96	
11	WFB x4756	8/3/2020 Deposit - Sables, LLC	6116 Chinook Way		2287	\$ 562,406.21	\$ 1,120,472.17	TS# 18-54677/Renshaw/LN# 1003584610				\$ 562,406.21			\$ 1,120,472.17	
12	WFB x4756	8/11/2020 Chevron				\$ 2.97	\$ 1,120,469.20								\$ 2.97	\$ 1,120,469.20
13	WFB x4756	8/12/2020 Costco Gas				\$ 33.31	\$ 1,120,435.89								\$ 33.31	\$ 1,120,435.89
14	WFB x4756	8/17/2020 Ace Parking (San Diego CA)				\$ 15.00	\$ 1,120,420.89								\$ 15.00	\$ 1,120,420.89
15	WFB x4756	8/17/2020 Laz Parking (San Ysidro CA)				\$ 26.00	\$ 1,120,394.89								\$ 26.00	\$ 1,120,394.89
16	WFB x4756	8/17/2020 SD Pakton Mkt1 (San Diego CA)				\$ 2.00	\$ 1,120,392.89								\$ 2.00	\$ 1,120,392.89
17	WFB x4756	8/17/2020 United Pacific (La Mesa CA)				\$ 15.00	\$ 1,120,377.89								\$ 15.00	\$ 1,120,377.89
18	WFB x4756	8/18/2020 Shell Oil				\$ 52.94	\$ 1,120,324.95								\$ 52.94	\$ 1,120,324.95
19	WFB x4756	8/19/2020 Myfico Com				\$ 59.85	\$ 1,120,265.10								\$ 59.85	\$ 1,120,265.10
20	WFB x4756	8/20/2020 Costco Gas				\$ 21.21	\$ 1,120,243.89								\$ 21.21	\$ 1,120,243.89
21	WFB x4756	8/28/2020 Edeposit - Sables LLC	14 Cobbs Creek Way Refund			\$ 334,000.00	\$ 1,454,243.89	TS# 18-52919/Aspiras/LN# 278458				\$ 334,000.00			\$ 1,454,243.89	
22	WFB x4756	8/28/2020 Withdrawal - CC to BFB \$19,767.09 & \$202.51 HOA	See Tab 5 (D13)			\$ 21,589.68	\$ 1,432,654.21								\$ 21,589.68	\$ 1,432,654.21
23	WFB x4756	8/31/2020 ATM Check Deposit - Equity Title	5632 Indian Ridge Sale \$379,999			\$ 365,752.66			Closing Proceeds - 20-						\$ 365,752.66	\$ 1,798,406.87
24	WFB x4756	8/31/2020 Interest				\$ 9.22			TTG-6117						\$ 9.22	\$ 1,798,416.09
25	WFB x4756	9/2/2020 NV Energy				\$ 569.57	\$ 1,797,846.52								\$ 569.57	\$ 1,797,846.52
26	WFB x4756	9/2/2020 NV Energy				\$ 51.32	\$ 1,797,795.20								\$ 51.32	\$ 1,797,795.20
27	WFB x4756	9/3/2020 Withdrawal for Purchase of Cashier's Checks	See Tab 5 (D32)			\$ 960,100.00	\$ 837,695.20								\$ 960,100.00	\$ 837,695.20
28	WFB x4756	9/3/2020 Withdrawal - Manu Dez - \$8k cash and 2 CC \$20k each	See Tab 5 (D19)			\$ 48,020.00	\$ 789,675.20								\$ 48,020.00	\$ 789,675.20
29	WFB x4756	9/8/2020 Costco Gas				\$ 40.99	\$ 789,634.21								\$ 40.99	\$ 789,634.21
30																
31	WFB x4756	9/21/2020 Costco Gas				\$ 26.93	\$ 1,221,825.63								\$ 26.93	\$ 1,221,825.63
32	WFB x4756	9/21/2020 Sky Top Ve				\$ 2.10	\$ 1,221,823.53								\$ 2.10	\$ 1,221,823.53
33	WFB x4756	9/22/2020 ATM Withdrawal				\$ 300.00	\$ 1,221,523.53								\$ 300.00	\$ 1,221,523.53
34	WFB x4756	9/23/2020 Zelle - to Company Consulting				\$ 499.99	\$ 1,221,023.54								\$ 499.99	\$ 1,221,023.54
35	WFB x4756	9/28/2020 Chevron				\$ 9.99	\$ 1,221,013.55								\$ 9.99	\$ 1,221,013.55
36	WFB x4756	9/28/2020 Costco Whse				\$ 481.44	\$ 1,220,532.11								\$ 481.44	\$ 1,220,532.11
37	WFB x4756	9/30/2020 Interest				\$ 1,220,541.05									\$ 1,220,541.05	
38	WFB x4756	10/2/2020 Costco Gas				\$ 41.94	\$ 1,220,499.11								\$ 41.94	\$ 1,220,499.11
39	WFB x4756	10/6/2020 Costco Gas				\$ 32.27	\$ 1,220,466.84								\$ 32.27	\$ 1,220,466.84
40	WFB x4756	10/7/2020 Homewisedocs Com				\$ 356.00	\$ 1,220,110.84								\$ 356.00	\$ 1,220,110.84
41	WFB x4756	10/26/2020 Costco Gas				\$ 37.39	\$ 1,220,073.45								\$ 37.39	\$ 1,220,073.45
42	WFB x4756	10/27/2020 Tacos El Gordo				\$ 23.13	\$ 1,220,050.32								\$ 23.13	\$ 1,220,050.32
43	WFB x4756	10/28/2020 Victorious Re				\$ 965.86	\$ 1,219,084.46								\$ 965.86	\$ 1,219,084.46
44	WFB x4756	10/30/2020 Costco Gas				\$ 36.37	\$ 1,219,048.09								\$ 36.37	\$ 1,219,048.09
45	WFB x4756	10/30/2020 Interest				\$ 10.36									\$ 10.36	
46	WFB x4756	11/3/2020 Transfer to Wells Fargo CC 7053				\$ 35,000.00	\$ 1,184,058.45								\$ 35,000.00	\$ 1,184,058.45
47	WFB x4756	11/4/2020 Return - Victorious				\$ 965.86									\$ 965.86	
48	WFB x4756	11/5/2020 Zelle - to Staging Home				\$ 150.00	\$ 1,184,874.31								\$ 150.00	
49	WFB x4756	11/6/2020 Cosmopolitan Box O				\$ 3,000.00	\$ 1,181,874.31								\$ 815.86	
50	WFB x4756	11/6/2020 Zelle - to Dez S				\$ 274.99	\$ 1,181,599.32								\$ 274.99	\$ 1,181,599.32
51	WFB x4756	11/12/2020 Costco Whse				\$ 17.87	\$ 1,181,581.45								\$ 17.87	\$ 1,181,581.45
52	WFB x4756	11/16/2020 Costco Whse				\$ 267.13	\$ 1,181,314.32								\$ 267.13	\$ 1,181,314.32
53	WFB x4756	11/17/2020 ATM Withdrawal				\$ 300.00	\$ 1,181,014.32								\$ 300.00	\$ 1,181,014.32
54	WFB x4756	11/18/2020 Costco Gas				\$ 18.99	\$ 1,180,995.33								\$ 18.99	\$ 1,180,995.33
55	WFB x4756	11/18/2020 Edeposit - BSI Refund W Warm Springs	See Tab 6 (G37) Purchase Warm Springs			\$ 9,206.34									\$ 9,206.34	
56	WFB x4756	11/18/2020 Edeposit - Folk Hess	See Tab 5 CC Purchase Falvo			\$ 15,799.99									\$ 15,799.99	
57	WFB x4756	11/18/2020 Edeposit - Hampton & Hampton	See Tab 5 CC Purchase Ashcroft (A26)			\$ 18,000.00									\$ 18,000.00	
58	WFB x4756	11/18/2020 Edeposit - PLM Lender Services	La Calera Refund			\$ 22,775.65									\$ 22,775.65	
59	WFB x4756	11/18/2020 Withdrawal				\$ 3,345.80	\$ 1,243,431.51								\$ 3,345.80	\$ 1,243,431.51
60	WFB x4756	11/23/2020 Chevron				\$ 47.00	\$ 1,243,384.51								\$ 47.00	\$ 1,243,384.51
61	WFB x4756	11/25/2020 Nevada Legal News				\$ 1.00	\$ 1,243,383.51								\$ 1.00	\$ 1,243,383.51
62	WFB x4756	11/27/2020 Costco Whse				\$ 633.31	\$ 1,242,750.20								\$ 633.31	\$ 1,242,750.20
63	WFB x4756	11/30/2020 Interest				\$ 1,242,760.13									\$ 9.93	
64	WFB x4756	12/7/2020 Zelle - to Company Consulting				\$ 501.99	\$ 1,242,258.14								\$ 501.99	
65	WFB x4756	12/7/2020 Zelle - to Dez S				\$ 101.99	\$ 1,242,156.15								\$ 101.99	
66	WFB x4756	12/14/2020 Transfer to Wells Fargo CC 7053				\$ 21,183.36	\$ 1,220,972.79								\$ 21,183.36	
67	WFB x4756	12/18/2020 Costco Gas				\$ 37.77	\$ 1,220,935.02								\$ 37.77	
68	WFB x4756	12/21/2020 ATM Withdrawal				\$ 300.00	\$ 1,220,635.02								\$ 300.00	
69	WFB x4756	12/21/2020 McDonalds				\$ 32.59	\$ 1,220,602.43								\$ 32.59	
70	WFB x4756	12/23/2020 Cash eWD				\$ 2,500.00	\$ 1,218,102.43								\$ 2,500.00	
71	WFB x4756	12/23/2020 Costco Whse				\$ 9.72	\$ 1,218,092.71								\$ 9.72	
72	WFB x4756	12/31/2020 Chedraui (Mexico)				\$ 84.24	\$ 1,218,008.47								\$ 84.24	
73	WFB x4756	12/31/2020 Interest				\$ 1,218,018.91									\$ 10.44	
74	WFB x4756	12/31/2020 Intl Trans Fee				\$ 2.52	\$ 1,218,016.39								\$ 2.52	
75	WFB x4756	12/31/2020 Intl Trans Fee				\$ 0.94	\$ 1,218,015.45								\$ 0.94	
76	WFB x4756	12/31/2020 Intl Trans Fee				\$ 0.30	\$ 1,218,015.15								\$ 0.30	\$ 1,218,015.15

Current as of 11/14/2022

Current as of 11/14/2022

Current as of 11/14/2022

1	A	B	C	D	E	F	G	H	I	L	N	O	P	Q	R	S		
<b>Sanam Limited</b>																		
2	Checking																	
3	Wells Fargo Bank																	
4	Account # x4756																	
5	Opened 07/28/2020 - Meelad Dezfooli, 09/03/2020 - Manouchehr Dezfooli added																	
6																		
7	Date	Description		Agent Notes	Add'l Notes	Check #	Deposit	Withdrawals	Balance	Memo		Deposit	Withdrawals	Balance	Deposit	Withdrawals	Balance	
8		Beginning Balance							\$ -						\$ -	\$ -		
220	WFB x4756	5/17/2021 Starbucks					\$ 12.25	\$ 298,860.11				\$ 0.00	\$ -		\$ 12.25	\$ 298,860.11		
221	WFB x4756	5/17/2021 Starbucks					\$ 12.25	\$ 298,847.86				\$ 0.00	\$ -		\$ 12.25	\$ 298,847.86		
222	WFB x4756	5/17/2021 Zelle to Consultant Building					\$ 200.00	\$ 298,847.86				\$ 0.00	\$ -		\$ 200.00	\$ 298,647.86		
223	WFB x4756	5/18/2021 Robinhood Funds 7731 Meelad Dezfooli		ATM Check Deposit/Albridge/Pite LLP			\$ 50,000.00	\$ 248,647.86				\$ 0.00	\$ -		\$ 50,000.00	\$ 248,647.86		
224	WFB x4756	5/21/2021 176 Glen Falls Ave., Henderson, NV 89002-9297/DION 090044-NV TP				3520	\$ 48,000.00		\$ 296,647.86			\$ 0.00			\$ 48,000.00	\$ -	\$ 296,647.86	
225	WFB x4756	5/21/2021 ATM Check Deposit National Default Servicing Corporation	7365 Southern Magnolia			62222	\$ 38,000.00		\$ 334,647.86			\$ 0.00			\$ 38,000.00	\$ -	\$ 334,647.86	
226	WFB x4756	5/21/2021 Robinhood Funds 7731 Meelad Dezfooli					\$ 50,000.00	\$ 284,647.86				\$ 0.00			\$ 50,000.00	\$ 284,647.86		
227	WFB x4756	5/21/2021 Wendy's					\$ 8.54	\$ 284,639.32				\$ 0.00			\$ 8.54	\$ 284,639.32		
228	WFB x4756	5/21/2021 Wendy's					\$ 5.41	\$ 284,633.91				\$ 0.00			\$ 5.41	\$ 284,633.91		
229	WFB x4756	5/21/2021 Withdrawal ATM					\$ 1,000.00	\$ 283,633.91				\$ 0.00			\$ 1,000.00	\$ 283,633.91		
230	WFB x4756	5/24/2021 Big Lot Stores					\$ 162.55	\$ 283,796.46				\$ 162.55			\$ -	\$ -	\$ 283,633.91	
231	WFB x4756	5/24/2021 Hafez Persian Cuisine					\$ 82.88	\$ 283,713.58				\$ 82.88			\$ 79.67	\$ -	\$ 283,633.91	
232	WFB x4756	5/24/2021 Nails 21					\$ 100.00	\$ 283,613.58				\$ 79.67			\$ 20.33	\$ 283,613.58		
233	WFB x4756	5/24/2021 Sams Club					\$ 17.30	\$ 283,596.28				\$ 0.00			\$ 17.30	\$ 283,596.28		
234	WFB x4756	5/24/2021 Wendy's					\$ 12.98	\$ 283,583.30				\$ 0.00			\$ 12.98	\$ 283,583.30		
235	WFB x4756	5/24/2021 Zelle to Consultant Building					\$ 99.46	\$ 283,483.84				\$ 0.00			\$ 99.46	\$ 283,483.84		
236	WFB x4756	5/25/2021 ATM Check Deposit-Equity Title	7310 Falvo Ave. - Tab 5 (D23)		3196 Baffetto Ct. - Tab 2					\$ 25,000.00, Order Number: 21-TTG-13605, Release								
237	WFB x4756	5/25/2021 Nails R US					\$ 791,316.21					\$ 0.00			\$ 791,316.21	\$ -	\$ 1,074,800.05	
238	WFB x4756	5/26/2021 Zelle to Consultant Building					\$ 172.00	\$ 1,074,628.05				\$ 0.00			\$ 172.00	\$ 1,074,628.05		
239	WFB x4756	5/27/2021 Robinhood Funds 7731 Meelad Dezfooli					\$ 100.59	\$ 1,074,527.46				\$ 0.00			\$ 100.59	\$ 1,074,527.46		
240	WFB x4756	5/28/2021 Interest					\$ 50,000.00	\$ 1,024,527.46				\$ 0.00			\$ 50,000.00	\$ 1,024,527.46		
241	WFB x4756	6/1/2021 Pizza Hut					\$ 3.65	\$ 1,024,521.11				\$ 0.00			\$ 3.65	\$ 1,024,521.11		
242	WFB x4756	6/1/2021 Sams Club					\$ 40.49	\$ 1,024,490.62				\$ 0.00			\$ 40.49	\$ 1,024,490.62		
243	WFB x4756	6/1/2021 Smiths Food					\$ 37.67	\$ 1,024,452.75				\$ 0.00			\$ 37.67	\$ 1,024,452.75		
244	WFB x4756	6/1/2021 WITHDRAWAL MADE IN A BRANCH/STORE	Missing				\$ 9.74	\$ 1,024,443.01				\$ 0.00			\$ 9.74	\$ 1,024,443.01		
245	WFB x4756	6/1/2021 WITHDRAWAL MADE IN A BRANCH/STORE	Missing															
246	WFB x4756	6/1/2021 Zelle to Parts Appliance																
247	WFB x4756	6/2/2021 ATM Check Deposit Equity Title of Nevada	7310 Falvo Ave.		197244		\$ 895,542.44	\$ 1,105,685.04							\$ 895,542.44		\$ 1,105,685.04	
248	WFB x4756	6/2/2021 In N Out Burger					\$ 12.46	\$ 1,105,672.58									\$ 12.46	\$ 1,105,672.58
249	WFB x4756	6/2/2021 Jamba Juice					\$ 13.64	\$ 1,105,658.94									\$ 13.64	\$ 1,105,658.94
250	WFB x4756	6/3/2021 El Pollo Loco					\$ 7.14	\$ 1,105,651.80									\$ 7.14	\$ 1,105,651.80
251	WFB x4756	6/4/2021 Costco Gas					\$ 50.52	\$ 1,105,601.28									\$ 50.52	\$ 1,105,601.28
252	WFB x4756	6/4/2021 Costco Whse					\$ 96.38	\$ 1,105,504.90									\$ 96.38	\$ 1,105,504.90
253	WFB x4756	6/4/2021 Jones Fee Pets					\$ 70.83	\$ 1,105,434.07									\$ 70.83	\$ 1,105,434.07
254	WFB x4756	6/4/2021 Wendy's					\$ 9.63	\$ 1,105,424.44									\$ 9.63	\$ 1,105,424.44
255	WFB x4756	6/7/2021 Cheesecake					\$ 73.88	\$ 1,105,350.56									\$ 73.88	\$ 1,105,350.56
256	WFB x4756	6/7/2021 Withdrawal ATM					\$ 1,000.00	\$ 1,104,350.56									\$ 1,000.00	\$ 1,104,350.56
257	WFB x4756	6/8/2021 Certus Air Vending					\$ 1.60	\$ 1,104,348.96									\$ 1.60	\$ 1,104,348.96
258	WFB x4756	6/8/2021 Costco Whse					\$ 610.33	\$ 1,103,738.63									\$ 610.33	\$ 1,103,738.63
259	WFB x4756	6/9/2021 Zelle to Consultant Building					\$ 201.85	\$ 1,103,536.78									\$ 201.85	\$ 1,103,536.78
260	WFB x4756	6/10/2021 Chipotle					\$ 15.71	\$ 1,103,521.07									\$ 15.71	\$ 1,103,521.07
261	WFB x4756	6/10/2021 Chipotle					\$ 20.37	\$ 1,103,500.70									\$ 20.37	\$ 1,103,500.70
262	WFB x4756	6/11/2021 Costco Whse					\$ 115.35	\$ 1,103,385.35									\$ 115.35	\$ 1,103,385.35
263	WFB x4756	6/14/2021 Chevron					\$ 87.87	\$ 1,103,297.48									\$ 87.87	\$ 1,103,297.48
264	WFB x4756	6/14/2021 Eastern Market					\$ 49.22	\$ 1,103,248.26									\$ 49.22	\$ 1,103,248.26
265	WFB x4756	6/16/2021 Cheesecake					\$ 60.29	\$ 1,103,187.97									\$ 60.29	\$ 1,103,187.97
266	WFB x4756	6/17/2021 Transfer to Wells Fargo Business Secured CC 3734					\$ 55,000.00	\$ 1,048,187.97									\$ 55,000.00	\$ 1,048,187.97
267	WFB x4756	6/18/2021 WITHDRAWAL MADE IN A BRANCH/STORE	Missing				\$ 12,429.62	\$ 1,035,758.35									\$ 12,429.62	\$ 1,035,758.35
268	WFB x4756	6/21/2021 Candid Saloon					\$ 170.00	\$ 1,035,588.35									\$ 170.00	\$ 1,035,588.35

1 Exhibit 7-1, book 5 – WF x4756 Cashier's Checks (Excerpt)  
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28 Exhibit 7-1, book 5 – WF x4756 Cashier's Checks (Excerpt)

Current as of 11/14/2022

1	A	B	C	D	G	H	I	J	K	L	M	N
2	Purpose	CK date	CL date	Amount	CK No/Serial #	Sequence #	CB, AU, Seq Num	Remitter	Purchaser	Payee	Sequence Neg	Endorsement/Negotiated Party
3	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814501	6241354059	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193405	
4	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814502	6241354060	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193404	
5	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814503	6241354061	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193406	All deposited at the same time
6	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814504	6241354062	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193398	
7	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814505	6241354063	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193403	
8	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814506	6241354064	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193399	
9	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814507	6241354065	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193402	
10	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814508	6241354066	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193401	
11	HOA Dues	8/28/2020	9/15/2020	\$ 202.51	741814509	6241354067	01 007418 0039	M Padeshah	Meelad Dezfooli	The Grand Legacy Community Association	8521193400	
12	Transfer	8/28/2020	9/1/2020	\$ 19,767.09	741805105	6241354068	01 007418 0039	M Padeshah	Meelad Dezfooli	Best Buy Flooring	8554672097	Deposited into FSB x9591
13				\$ 21,589.68								
14												
15												
16												
17	W Warm Springs	9/3/2020	9/30/2020	\$ 20,000.00	741805120	1186712944	11 0007418 0087	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	282401861	Auction.com
18	Dep 0900	9/3/2020	3/4/2021	\$ 20,000.00	741805121	1186712945	11 0007418 0087	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	7849381438	Not for Purpose Intended
19				\$ 8,020.00		Missing						Missing withdrawl information
20												
21												
22	Falvo	9/3/2020	9/14/2020	\$ 200,000.00	741801826	1186712923	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	8119253901	Folks Hess PLLC
23	Falvo	9/3/2020	9/10/2020	\$ 200,000.00	741801827	1186712924	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	8118980517	Folks Hess PLLC
24	Falvo	9/3/2020	9/10/2020	\$ 200,000.00	741801828	1186712925	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited		Folks Hess PLLC
25	Dep 0900	9/3/2020	3/4/2021	\$ 100,000.00	741805114	1186712927	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	7849381439	Not for Purpose Intended
26												
27	Ashcroft	9/3/2020	12/30/2020	\$ 100,000.00	741805113	1186712926	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	388357325	Clear Recon Corp
28	La Calera	9/3/2020	10/6/2020	\$ 50,000.00	741805116	1186712929	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	8111401103	Comerica Bank
29	Grace	9/3/2020	9/28/2020	\$ 20,000.00	741805117	1186712930	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	388257625	Quality Loan Service Corp
30	Grace	9/3/2020	9/28/2020	\$ 20,000.00	741805118	1186712931	11 0007418 0086	Holdings Trust	Manouchehr Dezfooli	Nevada Sales Limited	388257623	Quality Loan Service Corp
31				\$ 100.00		Missing						Missing withdrawl information
32												
33												
34												
35	S. Magnolia	2/4/2021	3/30/2021	\$ 200,000.00	741801857	1186715568	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	383480728	National Default
36	S. Magnolia	2/4/2021	3/30/2021	\$ 200,000.00	741801858	1186715570	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	383480729	National Default
37	S. Magnolia	2/4/2021	3/30/2021	\$ 200,000.00	741801859	1186715572	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	383480730	National Default
38	Cragged Draw	2/4/2021	4/26/2021	\$ 200,000.00	741801860	1186715574	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	8752895072	Trustee Corps Assoc Foreclosure Se
39	Cragged Draw	2/4/2021	4/26/2021	\$ 200,000.00	741801861	1186715576	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	8752895071	Trustee Corps Assoc Foreclosure Se
40	Glen Falls	2/4/2021	3/29/2021	\$ 200,000.00	741801862	1186715578	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	380779568	Clear Recon Corp
41	Killymoon	2/4/2021	7/28/2021	\$ 200,000.00	741801863	1186715580	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	381544908	Clear Recon Corp
42	Glen Falls	2/4/2021	3/29/2021	\$ 200,000.00	741801864	1186715582	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	380779569	Clear Recon Corp
43	Killymoon	2/4/2021	7/28/2021	\$ 200,000.00	741801865	1186715584	12 0007418 0092	Holdings Trust	Meelad Dezfooli	Nevada Sales Limited	381583895	Clear Recon Corp
44				\$ 8,322.68		Missing						Missing withdrawl information
45												
46												
47	Bentley	2/20/2021		\$ 301,620.87	741801866	1189103945	12 0007418 0038	M Dezfooli	Meelad Dezfooli	Towbin Motorcars LLC	288009554	Towbin Motorcars LLC
48												
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1 Exhibit F – Receipt of Funds for 176 Glen Falls Ave.  
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28 Exhibit F – Receipt of Funds for 176 Glen Falls Ave.

## RECEIPT OF FUNDS AND INSTRUCTIONS

T.S. NO. 090044-NV FILE NO. SPP927424 DATE 3-24-2021

TRUSTEE CLEAR RECON CORP

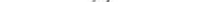
ADDRESS 4315 JUTLAND DR, STE 200

CITY SAN DIEGO STATE CA ZIP 92117

PHONE NO. 858-750-7600

CHECK NO.	NAME OF BANK	AMOUNT
0741801662	WELLS FARGO	\$ 200,000.00
0741801864	"	\$ 200,000.00
0741805364	"	\$ 50,000.00
0741805363	"	\$ 50,000.00
		\$
		\$

TOTAL OF ANY CASH RECEIVED		\$ <u>0</u>
SUCCESSFUL BID \$	<u>452,000.00</u>	TOTAL RECEIVED \$ <u>500,000.00</u>
TRANSFER TAX \$	<u>0</u>	AMOUNT REQUIRED \$ <u>452,000.00</u>
RECORDING FEES \$	<u>0</u>	REFUND AMOUNT \$ <u>48,000.00</u>
REFUND PAYABLE TO	<u>Sanam Limited</u>	

RECEIVED BY **BUYERS SIGNATURE** 

BUYERS NAME MEELAD DEZFOOLI DRIVERS LICENSE NO. NVDL

TITLE TO PROPERTY TO BE VESTED AS FOLLOWS *Sanam Limited*

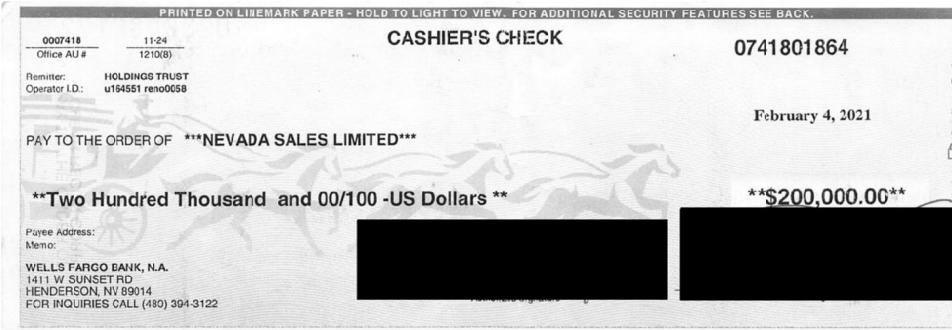
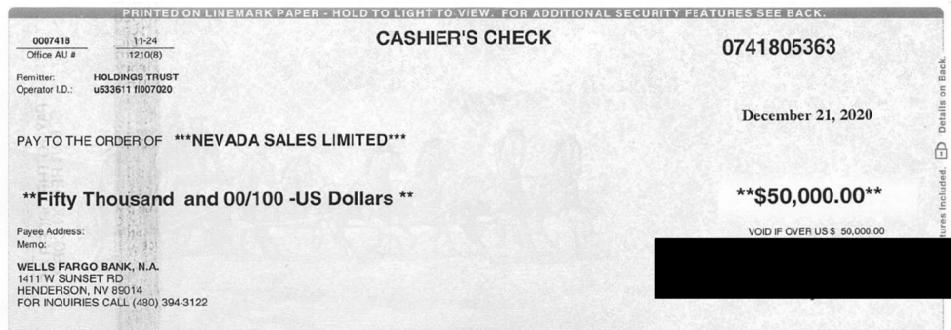
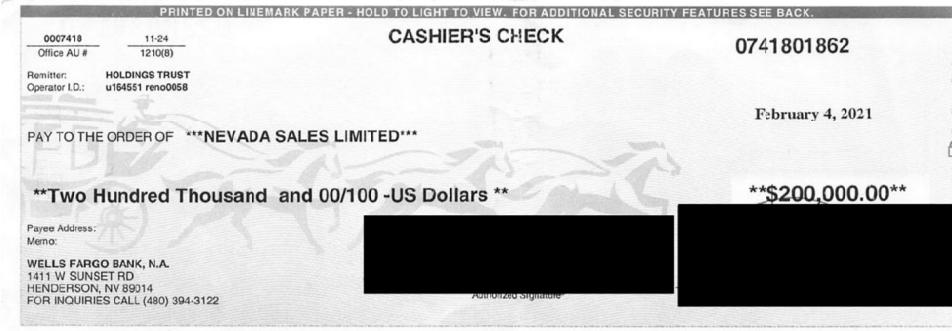
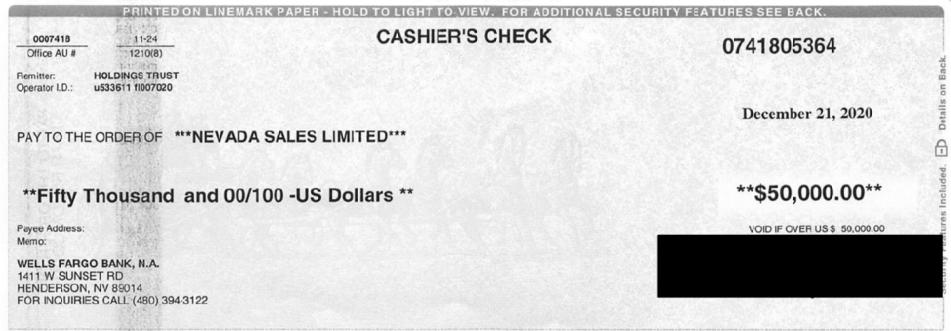
ADDRESS 34 SANDWEDGE DR.

CITY HENDERSON STATE NV ZIP 89074

PHONE NO. [REDACTED] PRESENT  INTERESTED

1 Exhibit G – Cashier's Checks to Purchase 176 Glen Falls Ave.  
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Exhibit G – Cashier's Checks to Purchase 176 Glen Falls Ave.



1 Exhibit H – Deed Upon Sale for 176 Glen Falls Ave.  
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28 Exhibit H – Deed Upon Sale for 176 Glen Falls Ave.

**Clear Recon Corp  
4375 Jutland Drive  
San Diego, California 92117  
(858) 750-7600**

3/24/2021

Sanam Limited  
34 Sandwedge Dr  
Henderson, NV 89074

TS #: **090044-NV**  
Property Address: **176 GLEN FALLS AVE  
HENDERSON, NV 89002-9297**

Dear Sanam Limited,

Enclosed herein please find the **unrecorded** Trustee's Deed Upon Sale for the above mentioned property which you purchased at the foreclosure sale held on 3/24/2021.

XX A refund in the amount of \$48,000.00 enclosed.  
\_\_\_\_\_ The exact amount was collected at the sale and there will not be any refund.

**Please note, effective June 1, 2015, 'within 5 days after recording the trustee's deed upon sale, the trustee or successful bidder, whoever recorded the trustee's deed upon sale pursuant to subsection 10, shall cause a copy of the trustee's deed upon sale to be posted conspicuously on the property.' SB 239 amending NRS 107.080(11).**

Should you have any questions or concerns in regards to this matter please feel free to give us a call. We will be glad to be of any assistance.

Thank you,

---

Leticia M Contreras-Oyos, Foreclosure Specialist

A.P.N.: 179-31-212-022

RECORDING REQUESTED BY:  
CLEAR RECON CORP

AND WHEN RECORDED TO:  
Sanam Limited  
34 Sandwedge Dr  
Henderson, NV 89074

Forward Tax Statements to  
the address given above

---

T.S. # 090044-NV      Loan #: \*\*\*\*\*0514  
Order #: 191315360-NV-VOI

SPACE ABOVE LINE FOR RECORDER'S USE

**The undersigned hereby affirms that there is no Social Security number contained in this document.**

### TRUSTEE'S DEED UPON SALE

Transfer Tax: \$2,305.20

The Grantee Herein was not the Foreclosing Beneficiary.

The Amount of the Unpaid Debt was \$505,499.81

The Amount Paid by the Grantee was \$452,000.00

Said Property is in the City of HENDERSON, County of Clark

**CLEAR RECON CORP**, as Trustee, (whereas so designated in the Deed of Trust hereunder more particularly described or as duly appointed Trustee) does hereby **GRANT** and **CONVEY** to

**Sanam Limited with the address of Sanam Limited, 34 Sandwedge Dr, Henderson, NV 89074**

(herein called Grantee) but without covenant or warranty, expressed or implied, all rights, title and interest conveyed to and now held by it as Trustee under the Deed of Trust in and to the property situated in the county of **Clark**, State of Nevada, described as follows:

LOT 17 IN BLOCK "C" OF PARADISE HILLS NO. 16, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 97 OF PLATS, PAGE 8 IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA. EXCEPTING THEREFROM ALL MINERALS, OIL, GAS, PETROLEUM, OTHER HYDROCARBON SUBSTANCES AND ALL GEOTHERMAL ENERGY SOURCES IN OR UNDER OR WHICH MAY BE PRODUCED FROM THE WITHIN-DESCRIBED LAND WHICH LIE BELOW A PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF THE WITHIN-DESCRIBED LAND, FOR THE PURPOSE OF PROSPECTING, EXPLORATION, DEVELOPMENT, PRODUCTION, OR EXTRACTION OF SAID SUBSTANCES BY MEANS OF MINES, WELLS, DERRICKS, AND/OR OTHER EQUIPMENT; PROVIDED, HOWEVER, THAT THE OWNER OF SAID SUBSTANCES SHALL HAVE NO RIGHT TO ENTER THE SURFACE OF THE WITHIN -DESCRIBED LAND NOR TO USE SAID LAND ABOVE SAID PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF SUCH LAND.

This conveyance is made in compliance with the terms and provisions of the Deed of Trust executed by **MARK RICHARD DION, AND LISA LYNN DION, TRUSTEES OF THE DION FAMILY TRUST DATED DECEMBER 4TH 1998** as Trustor, dated 6/12/2009 of the Official Records in the office of the Recorder of Clark, Nevada under the authority and powers vested in the Trustee designated in the Deed of Trust or as the duly appointed Trustee, default having occurred under the Deed of Trust pursuant to the Notice of Breach and Election to

## TRUSTEE'S DEED UPON SALE

T.S. #: 090044-NV  
Loan #: \*\*\*\*\*0514  
Order #: 191315360-NV-VOI

Sell under the Deed of Trust recorded on 6/23/2009, as Instrument No. 20090623-0003917 of official records. Trustee having complied with all applicable statutory requirements of the State of Nevada and performed all duties required by the Deed of Trust including sending a Notice of Breach and Election to Sell within ten days after its recording and a Notice of Sale at least twenty days prior to the Sale Date by certified return receipt mail, postage pre-paid to each person entitled to notice in compliance with Nevada Revised Statutes 107.080

All requirements per Nevada Statutes regarding the mailing, personal delivery and publication of copies of Notice of Default and Election to Sell under Deed of Trust and Notice of Trustee's Sale, and the posting of copies of Notice of Trustee's Sale have been complied with. Trustee, in compliance with said Notice of Trustee's sale and in exercise of its powers under said Deed of Trust sold said real property at public auction on 3/24/2021. Grantee, being the highest bidder at said sale became the purchaser of said property for the amount bid, being \$ 452,000.00, in lawful money of the United States, or by the satisfaction, pro tanto of the obligation than secured by said Deed of Trust.

In witness thereof, CLEAR RECON CORP, as Trustee, has this day, caused its name to be hereunto affixed by its officer thereunto duly authorized by its corporation by-laws

Date: MAR 30 2021

CLEAR RECON CORP



Monica Chavez  
Authorized Signor

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California} ss  
County of San Diego}

On MAR 30 2021 before me SUSANA JIMENEZ Notary Public, personally appeared Monica Chavez who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)



TS#: 090044-NV

**STATE OF NEVADA**  
**DECLARATION OF VALUE FORM**

1. Assessor Parcel Number(s)
  - a. 179-31-212-022
  - b. \_\_\_\_\_
  - c. \_\_\_\_\_
  - d. \_\_\_\_\_
2. Type of Property
 

a. <input type="checkbox"/> Vacant Land	b. <input checked="" type="checkbox"/> Single Fam. Res.
c. <input type="checkbox"/> Condo/Twnhse	d. <input type="checkbox"/> 2-4 Plex
e. <input type="checkbox"/> Apt. Bldg	f. <input type="checkbox"/> Comm'l/Ind'l
g. <input type="checkbox"/> Agricultural	h. <input type="checkbox"/> Mobile Home
i. <input type="checkbox"/> Other _____	
3. a. Total Value/Sales Price of Property: \$452,000.00  
 b. Deed in Lieu of Foreclosure Only (value of property) \_\_\_\_\_  
 c. Transfer Tax Value: \$452,000.00  
 d. Real Property Transfer Tax Due \$2,305.20

**FOR RECORDER'S OPTIONAL USE ONLY**

Book: \_\_\_\_\_ Page: \_\_\_\_\_

Date of Recording: \_\_\_\_\_

Notes: \_\_\_\_\_

4. **If Exemption Claimed:**
  - a. Transfer Tax Exemption per NRS 375.090, Section \_\_\_\_\_
  - b. Explain Reason for Exemption: \_\_\_\_\_
5. Partial Interest: Percentage being transferred: 100 %
 

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature MC \_\_\_\_\_ Capacity \_\_\_\_\_

Signature \_\_\_\_\_ Capacity \_\_\_\_\_

Signature \_\_\_\_\_ Capacity \_\_\_\_\_

Monica Chavez

Authorized Signor

**SELLER (GRANTOR) INFORMATION**  
**(REQUIRED)**

ONLY ONE NAME REQUIRED

Print Name: CLEAR RECON CORP  
 Address: 4375 JUTLAND DRIVE, SUITE 200  
 City: SAN DIEGO  
 State: CA Zip: 92117

**BUYER (GRANTEE) INFORMATION**  
**(REQUIRED)**

ONLY ONE NAME REQUIRED

Print Name: Sanam Limited  
 Address: 34 Sandwedge Dr  
Henderson, NV 89074

**COMPANY/PERSON REQUESTING RECORDING (Required if not seller or buyer)**

Print Name: ServiceLink, A Black Knight Financial Services Company  
 Address: 3220 El Camino Real  
 Irvine, CA 92602

Escrow #: \_\_\_\_\_

1 Exhibit I – Refund Check from Purchase of 176 Glen Falls Ave.  
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28 Exhibit I – Refund Check from Purchase of 176 Glen Falls Ave.

**ALDRIDGE|PITE LLP**  
 CA IOLTA Attorney Trust Account  
 Fifteen Piedmont Center  
 3575 Piedmont Center  
 Suite 500  
 Atlanta, GA 30305

WELLS FARGO BANK

003520

16-24-1220

090044-NV TP

03/30/2021

\$48,000.00

PAY --Forty-Eight Thousand and 00/100 ----- Dollars

TO  
THE  
ORDER  
OF  
Sanam Limited

176 GLEN FALLS AVE, HENDERSON, NV 89002-9297/DION

AUTHORIZED SIGNATURE

1003520

ALDRIDGE PITE, LLP

3520

Check Number: 3520

Date: March 30, 2021

Order Number: 090044-NV TP

TAC: WFBIOLTACA-3260

Ledger Comment: 176 GLEN FALLS AVE, HENDERSON, NV 89002-9297

Responsible Party:

Pay To: Sanam Limited

Check Amount: \$48,000.00

Memo: 176 GLEN FALLS AVE, HENDERSON, NV 89002-9297/DION

ALDRIDGE PITE, LLP

3520

Check Number: 3520

Date: March 30, 2021

Order Number: 090044-NV TP

TAC: WFBIOLTACA-3260

Ledger Comment: 176 GLEN FALLS AVE, HENDERSON, NV 89002-9297

Responsible Party:

Pay To: Sanam Limited

Check Amount: \$48,000.00

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